

ANTI-CORRUPTION POLICY AND STANDARDS

1. Introduction

ATADEL FUND s.r.o. ČO 09242741 (hereinafter referred to as the 'Company') is committed to maintaining high ethical standards and extending the integrity of its business practices to any part of the world. The company will not resort or be open to bribery and/or corruption.

ATADEL FUND s.r.o. should formalise its policy on compliance with the anti-corruption laws, including Convention based on Article K.3 (2) (c) of the Treaty on the Fight against Corruption of the European Union involving officials of the European Communities or officials of the Member States of the European Union. OJ C 195, 25.6.1997, the US Foreign Corrupt Practices Act 1977

The purpose of this document is to outline the policy of the Company with regard to bribes and corruption. This policy applies directly to all employees, directors, agents, consultants, Customers, entrepreneurs, and other persons or bodies related to the Company or interacting with the company in any region, area, or function.

It is important that you read and understand this document, and act in compliance with the policy set out in it.

2. Scope

According to the various globally accepted anti-corruption regulations, it is illegal to proffer money or any other similar assets (such as gifts, business lunches, dinners, or entertainment) to individuals for the purposes of starting or keeping certain business relations, or to secure any unlawful benefits. These regulations, however, do not preclude any reasonable or customary business gifts, food, or entertainment.

Any excessively generous gifts or hospitality, both offered and received, are regarded as unacceptable, because they may give the impression that the Company is trying to create or receive an advantageous business relationship by providing personal benefits to certain individuals. In addition, any gifts and hospitality may in and of themselves be considered bribery. Make sure that all gifts and hospitality are consistent with the customary and reasonable purposes involved in the ordinary business of the Company.

3. Subsidiary payments

The Company will not make or receive any payments or bribes aimed at mitigating the existing circumstances. If you are authorised to make a payment on behalf of the Company, you should always be aware of the actual reason for the payment and make sure that the requested amount is consistent with the goods or services which have been provided. You should always demand a receipt specifying the reason for the payment. If you have any doubts, concerns, or questions about a payment, you should refer them to your manager.

All workers must avoid any activities that may lead to a payment of this kind or for which they have reason to suspect a payment will be made or received by the Company.

4. Conflict of interests

The employees of the Company must avoid any situations or transactions where their personal interests may be in conflict with each other or where they may be in conflict with the interests of the Company. This includes the use for personal benefit of any information about customers and their relations with the Company; disclosure of such information to third parties; or acting in a way that may be interpreted as insider dealing.

Conflict of interests may arise when the employees have personal interests in business transactions related to the Company. Such personal interests may be direct or indirect, and may refer not only to the interests of the employee, but also to those of the members of his/her family, or his/her friends. If there is any possibility of a conflict of interests, the interests of the company will prevail. The employees must disclose any personal conflict of interests or any presumed conflict of interests to their direct supervisor.

5. Archives

The company keeps financial records and conducts appropriate internal audits to certify the business reasons for the payments it makes to third parties.

All accounts, invoices, and other documents and records related to its relations with third parties, such as customers, suppliers, and business contacts, must be prepared and maintained with accuracy and completeness.

6. Responsible persons

If you have any doubts with regard to the implementation of this policy, please refer them to the info@atadelfund.com.

The Compliance Officer is the Chief Financial Officer.

Consult with the manager, if you suspect that any employee of the Company may be involved in bribery, corruption, fraud, or other types of unacceptable or unethical behaviour.

7. Governing law

The Company must follow all applicable national anti-bribery and anti-corruption laws, especially those which fall within the jurisdiction of the countries where the Company has offices or performs business operations.

The formulation of the principles set out in this policy pays special attention to the requirements of the EU anti-corruption regulations. Adherence to the EU requirements is mandatory for many of the customers of the Company and they have been fully adopted by the Company.

8. Summary

Please make sure that you have read and understand this document, and that you follow the requirements set out in this policy at any time.

The prevention, exposure, and reporting of bribes and/or other forms of corruption are the responsibility of all employees who work at or for the Company. All workers are required to avoid any activities which imply or may lead to violations of this policy.

You are required to notify your manager as soon as practically possible, if you are convinced or merely suspect that there is any conflict with this policy, or that there may be any such conflict in the future.

Any employee who has breached this policy may be subjected to disciplinary actions which might result in termination in the event of serious offences.

The Company reserves its right to terminate its contractual relations with any workers who violate this policy.

25/07/2021