

Athla Capital Management

Anti-Bribery and Corruption Policy

Introduction

Athla Capital Management Ltd (**Athla, we** or **The Company**) values its reputation for ethical behaviour and for financial probity and reliability. It recognises that, over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. Its aim therefore is to limit its exposure to bribery by:

- Setting out a clear anti-bribery policy.
- Training all representatives and clients, so that they can recognise and avoid the use of bribery by themselves and others.
- Encouraging its representatives and clients to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately.
- Notifying all third parties that Athla representatives engage with of its policy and zero tolerance of bribery and/or corruption.
- Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution.
- Taking firm and vigorous action against any individual(s) involved in bribery.

The policy

The policy applies to all persons working for us or on our behalf in any capacity (**representatives**), including directors, employees, consultants, interns, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located.

Athla prohibits:

the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement to or from any person or company, wherever they are situated and whether they are a public official or body or private person or company

by

any individual or other person or body acting on The Company's behalf

in order to

gain any commercial, contractual or regulatory advantage for The Company in a way which is unethical

or in order to

gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

Further clarification

Athla recognises that market practice varies across the territories in which it does business and what is normal and acceptable in one place may not be in another. This policy prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of The Company or of the person or body employing or contracting with them or whom they represent.

This policy is not meant to prohibit the following practices providing they are customary in a particular market, are proportionate and are properly recorded, normal and appropriate:

- hospitality
- the giving of a gift for a corporate reason as long as it is reported in the proper manner within the firm on the gifts register
- the giving of a gift at another special time as long as it is reported in the proper manner within the firm on the gifts register

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to the Director with responsibility for this policy before proceeding. If necessary, guidance should also be sought from the Compliance Officer.