



ATL Global
Ventures

ATL Global Venture – Conflict of Interest Policy

1. Purpose & Commitment

ATL Global Venture is committed to conducting business with **integrity, transparency, and professionalism**. This **Conflict of Interest Policy** aims to prevent, identify, disclose, and manage conflicts of interest that may arise in our operations, ensuring that all business decisions are made in the best interest of the company and its stakeholders.

2. Definitions

- **Conflict of Interest:** Any situation where personal interests, relationships, or external affiliations may interfere with the objective and impartial decision-making within ATL Global Venture.
- **Direct Conflict:** When an individual's personal interests directly clash with company interests.
- **Indirect Conflict:** When a close associate (e.g., family member or business partner) has interests that may conflict with ATL Global Venture.
- **Actual Conflict:** A conflict that has materialized and is actively affecting business decisions.
- **Potential Conflict:** A conflict that may arise in the future under specific circumstances.

3. Scope & Application

This policy applies to **all employees, executives, suppliers, contractors, board members, and business partners** associated with ATL Global Venture, regardless of their role or location.

4. Overarching Principles

Integrity & Ethical Conduct

✓ **Strict zero tolerance** for corruption, bribery, or fraudulent practices. ✓ Business must be conducted with **objectivity, professionalism, and impartiality**. ✓ Employees and suppliers must disclose **any potential or actual conflict of interest** that may affect business decisions.

Transparency & Accountability

★ Full disclosure of relationships or transactions that may cause conflicts. ★ Confidentiality protection for reporting concerns without fear of retaliation. ★ The interest of ATL Global Venture always **takes priority over personal gain**.

Fair Competition & Non-Discrimination

- ☞ Equal treatment and non-discrimination of all employees, stakeholders, and business partners.
- ☞ Professional relationships should be conducted **without bias or preferential treatment**. ☞ Employees must refrain from influencing private transactions using ATL Global Venture's name.

5. Identifying & Managing Conflicts of Interest

Conflicts may arise in the following situations:

- **Self-benefit:** When an employee or executive **uses ATL Global Venture's resources or business opportunities** for personal gain.
- **External affiliations:** Holding **shares or directorship in a competitor or supplier** while engaged with ATL Global Venture.
- **Preferential hiring:** Employing **family members or close associates** without proper disclosure.
- **Supplier relationships:** Engaging with suppliers or vendors in a **biased or non-transparent manner**.
- **Private transactions:** Using ATL Global Venture's **business influence or confidential information** for personal investments or external dealings.
- **Competing interests:** Operating a **side business or consultancy** that directly competes with ATL Global Venture.

6. Responsibilities & Disclosure Guidelines

◆ **Employees & Executives:** Must **disclose any potential conflicts** in writing to management.
◆ **Suppliers & Contractors:** Must **declare business relationships** that may affect fair trading conditions. ◆ **Board Members:** Must abstain from **decisions that may be influenced by personal interests**. ◆ **HR & Ethics Committee:** Will **review disclosures, assess risks, and implement corrective actions** if needed.

☞ **Reporting Conflicts:** Any concerns should be reported via ATL Global Venture's **Ethics & Compliance Team**, ensuring confidentiality and impartial resolution.

7. Compliance & Consequences of Violation

Failure to comply with the Conflict of Interest Policy may result in: ☞ **Disciplinary actions**, including warnings, suspension, or termination of employment. ☞ **Termination of business relationships** with suppliers or stakeholders who violate ethical standards. ☞ **Legal consequences** if breaches involve fraudulent practices or regulatory violations.

ATL Global Venture remains committed to **building a transparent, ethical, and responsible global supply chain** that prioritizes **fair business practices and trust** among all stakeholders.