

Amedeo Air Four Plus Limited (the “Company”)

Anti-Bribery Policy

Prepared by the Secretary on 28 September 2018

Approved by the Board on 24 October 2018

One of the Company's core values is to uphold responsible and fair business practices. The Board is committed to promoting and maintaining the highest level of ethical standards in relation to all of the Company's business activities. Its reputation for maintaining lawful business practices is of paramount importance and this policy is designed to preserve these values.

The Board has undertaken to operate the Company's business in an honest and ethical manner and accordingly takes a zero tolerance position towards bribery and corruption. The key components of this approach are implemented as follows:

- The Board is committed to acting professionally, fairly and with integrity in all of its business dealings and relationships;
- The Company and its subsidiaries (the “**Group**”) will implement and enforce effective procedures to counter bribery; and
- The Group requires all its service providers and advisors to adopt equivalent or similar principles.

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

The Board expects all service providers to the Group to behave in the same manner and to practice and encourage others to practice with integrity, in a professional and ethical manner, in all their dealings related to the business of the Group.

This policy applies to any individual or corporate entity associated with the Group or who performs functions in relation to, or for and on behalf of, the Group, including but not limited to:

1. the Board of directors of the Company;
2. Amedeo Limited, Asset Manager of the Company;
3. Nimrod Capital LLP, Corporate and Shareholder Adviser to the Company;
4. JTC Fund Solutions (Guernsey) Limited, Administrator and Secretary of the Company;
5. Herbert Smith Freehills LLP, legal advisers to the Company (as to English Law);
6. Carey Olsen, legal advisers to the Company (as to Guernsey Law)
7. KPMG Dublin, Auditor of the Company;
8. Anson Registrars Limited, Registrar of the Company; and
9. Maples Fiduciary Services (Ireland) Limited, Secretary of the Company's Irish subsidiaries.

This policy has been added to the Company's website and key service providers specified above have been advised of the Company's zero tolerance position towards bribery and corruption.