



FIN-POL-002

Compliance Framework

*A Principles-led Framework for Lawful,
Ethical and Responsible Conduct*

Finova Policy

Built on Integrity, Discipline and Trust

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Document Control

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1. Policy Statement

Finova is committed to conducting its activities lawfully, ethically, and responsibly across all jurisdictions in which it operates or engages. Compliance is not treated as an administrative requirement, but as a fundamental condition of engagement and a core element of trust.

This policy sets out how Finova establishes and maintains a structured compliance framework to support lawful conduct, informed decision-making, and appropriate risk management.

2. Our Approach to Compliance

Finova operates a risk-based and proportionate compliance framework, designed to reflect the nature of its activities, the assets involved, and the jurisdictions and counterparties with whom it engages.

Compliance considerations are integrated into normal decision-making rather than applied retrospectively. The depth and formality of compliance measures applied will vary depending on context, but the underlying expectation of lawful and ethical conduct remains consistent across all engagements.

Finova recognises that compliance risk may arise from legal, regulatory, financial crime, sanctions, data protection, and reputational factors, and that failure to manage these risks may have consequences beyond any single transaction.

3. How Compliance is Applied

Compliance is considered from the outset of any engagement and throughout its lifecycle.

In practice, this means that Finova:

- assesses legal and regulatory alignment before engagement begins,
- considers jurisdictional requirements based on asset type, location, origin, destination, and end use,
- applies enhanced scrutiny where complexity, value, or sensitivity increases, and
- requires clarity and transparency from counterparties and partners.

Where information is incomplete, inconsistent, or withheld, Finova will not proceed until sufficient clarity is achieved.

4. Jurisdictional Alignment

Finova's compliance framework is informed by, and aligned with, applicable legal and regulatory requirements across multiple jurisdictions, including where relevant:

- the United Kingdom,
- the United States,
- the European Union, and
- the United Arab Emirates.

Finova recognises that specific engagements may also trigger obligations under other national or supranational regimes depending on circumstances. Engagement proceeds only where lawful alignment can be reasonably established.

5. Governance and Oversight

Responsibility for compliance sits with Finova's management, supported by defined escalation and decision-making pathways.

Matters presenting elevated or non-standard compliance risk are subject to increased scrutiny and senior-level consideration. Where appropriate, external professional advice may be sought to inform compliance assessment.

Finova reserves the right to refuse or disengage from any engagement where compliance requirements cannot be met, or where risk exceeds acceptable thresholds.

6. Financial Crime and Sanctions Considerations

Finova's compliance framework incorporates controls intended to mitigate exposure to:

- money laundering and related financial crime,
- proceeds of crime concerns, and
- sanctions and trade restriction breaches.

These considerations are addressed through alignment with recognised AML, CTF, and sanctions principles, and are further detailed in related policies, including:

- FIN-POL-003 – Anti-Money Laundering & Counter-Terrorist Financing, and
- FIN-POL-004 – Sanctions Compliance.

7. Alignment with Recognised Compliance Principles

Finova's compliance framework is informed by internationally recognised compliance and governance principles, including those reflected in standards such as ISO 37301.

Such references are made to guide structure and approach, without implying certification or formal registration against any specific standard.

8. Review and Continuous Improvement

This policy is reviewed periodically to ensure it remains appropriate, effective, and aligned with Finova's activities and operating environment.

The compliance framework evolves in response to regulatory change, operational experience, and the nature of engagements undertaken, and this policy will be updated where necessary to reflect that evolution.



Compliance Disclaimer

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