



FIN-POL-003

Anti-Money Laundering & Counter Terrorist Financing

*A Risk based approach to Preventing
Financial Crime and Illicit Activity*

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 preventing its activities from being used for money laundering, terrorist financing, or other forms of financial crime. Protecting the integrity of the firm, its counterparties, and the wider financial system is fundamental to maintaining trust and operating responsibly.

This policy sets out how Finova approaches anti-money laundering and counter-terrorist financing in a structured, proportionate, and risk-based manner.

2. Our Approach to AML and CTF

Finova applies a risk-based approach to AML and CTF, recognising that risk levels vary depending on the nature of the engagement, the assets involved, the jurisdictions concerned, and the profile of counterparties.

AML and CTF considerations are integrated into normal decision-making rather than treated as a standalone compliance exercise. The depth and formality of checks applied are proportionate to the level of risk identified, with enhanced scrutiny applied where risk factors increase.

Finova does not engage in activity where there is reasonable concern that funds or assets may be linked to criminal conduct or terrorist activity.

3. How AML and CTF is Applied

AML and CTF assessment begins at the earliest stage of engagement and continues throughout the lifecycle of any activity.

In practice, this means that Finova:

- seeks to understand the identity, ownership, and control of counterparties,
- considers the source of funds and source of assets involved in an engagement,
- assesses jurisdictional exposure and transaction structure, and
- applies enhanced due diligence where risk indicators are present.

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

4. Governance and Oversight

Responsibility for AML and CTF compliance sits with Finova's management, supported by appropriate internal oversight and escalation mechanisms.

Matters presenting elevated AML or CTF risk are subject to increased scrutiny and senior-level consideration. Finova reserves the right to seek external professional input where necessary to inform its assessment.

Finova will decline to engage, or will disengage, where AML or CTF risks cannot be adequately understood or mitigated.

5. Sanctions and Related Financial Crime Considerations

AML and CTF considerations are closely linked to sanctions, proceeds of crime, and broader financial crime risk.

Finova's AML approach therefore operates in conjunction with:

- sanctions screening and jurisdictional alignment, and
- assessment of proceeds of crime risk.

These matters are addressed further in related policies, including:

- FIN-POL-004 – Sanctions Compliance, and
- FIN-POL-005 – Proceeds of Crime.

6. Alignment with Recognised AML Principles

Finova's approach to AML and CTF is informed by internationally recognised AML and financial crime prevention principles, including those reflected in frameworks and guidance issued by bodies such as the Financial Action Task Force (FATF).

References to such principles are intended to guide approach and structure, without implying certification or regulatory designation.

7. Review and Continuous Improvement

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

Finova's AML and CTF approach evolves in response to regulatory developments, emerging risk patterns, and operational experience, and this policy will be updated where necessary to reflect that evolution.



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