

FIN-POL-004

Sanctions Compliance Policy

*A Structured Approach to Identifying and
Managing Sanctions Risk*

Finova Policy

Built on Integrity, Discipline and Trust

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Finova Trading FZE LLC

Call & WhatsApp: +971 56 126 2623 ❖ +44 7714 612701

Email: info@finovatrading.com

Web: <https://finovatrading.com>

Document Control

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1. Policy Statement

Finova is committed to complying with applicable economic sanctions, trade restrictions, and embargoes. Sanctions compliance is a fundamental condition of engagement and an essential element of Finova's approach to lawful and responsible operation.

This policy sets out how Finova approaches sanctions compliance in a structured, risk-based, and proportionate manner.

2. Our Approach to Sanctions Compliance

Finova recognises that sanctions regimes are complex, dynamic, and jurisdiction-specific. The firm therefore applies a cautious and conservative approach to sanctions risk, prioritising clarity, verification, and lawful alignment over speed or commercial opportunity.

Sanctions considerations are integrated into decision-making at the outset of any engagement and revisited as circumstances evolve. Where sanctions risk cannot be clearly understood or managed, Finova will not proceed.

3. How Sanctions Risk is Considered

Sanctions risk is assessed by reference to multiple factors, including:

- the identity and ownership of counterparties,
- the jurisdictions involved, including origin, transit, and destination,
- the nature of the assets or activities concerned, and
- the structure and purpose of the engagement.

Finova considers both direct and indirect sanctions exposure, including the risk of facilitation, circumvention, or indirect benefit to sanctioned persons or entities.

4. Applicable Sanctions Regimes

Finova's sanctions compliance approach is informed by applicable sanctions regimes, including where relevant those administered by authorities in:

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

Finova also recognises that other national or multilateral sanctions regimes may apply depending on the specific circumstances of an engagement.

Engagement proceeds only where alignment with applicable sanctions requirements can be reasonably established.

5. Governance and Oversight

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

Matters presenting elevated or ambiguous sanctions risk are subject to increased scrutiny and senior-level consideration. Where necessary, Finova will seek external professional advice to inform its assessment.

Finova reserves the right to refuse or disengage from any engagement where sanctions compliance cannot be assured.

6. Relationship to Financial Crime and AML Controls

Sanctions compliance is closely linked to anti-money laundering, proceeds of crime, and broader financial crime considerations.

Finova's sanctions approach operates in conjunction with related policies, including:

- FIN-POL-003 – Anti-Money Laundering & Counter-Terrorist Financing, and
- FIN-POL-005 – Proceeds of Crime.

These policies together support a coherent approach to financial crime and sanctions risk.

7. Alignment with Recognised Sanctions Principles

Finova's approach to sanctions compliance is informed by recognised international sanctions compliance principles and guidance, including those reflected in regulatory and governmental publications.

Such references guide structure and approach, without implying certification, registration, or regulatory endorsement.

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.

Sanctions regimes evolve rapidly, and Finova's approach will adapt as necessary to reflect regulatory developments and emerging risk patterns.



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