

FIN-POL-005

# Proceeds of Crime Policy

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*A Structured Approach to Identifying and  
Managing Sanctions Risk*

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**Finova Policy**

*Built on Integrity, Discipline and Trust*

December 2025



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## Document Control

| Item               | Detail                         |
|--------------------|--------------------------------|
| Policy Owner       | Finova Management              |
| Approval Authority | Chief Executive                |
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| Review Cycle       | Annual                         |
| Current Version    | V2.0                           |

### 1. Policy Statement

Finova is committed to ensuring that it does not engage in, facilitate, or benefit from activity involving the proceeds of crime. Protecting the firm, its counterparties, and the integrity of the markets in which it operates is fundamental to maintaining trust and operating responsibly.

This policy sets out how Finova identifies, considers, and manages proceeds of crime risk across its activities and engagements.

### 2. Our Approach to Proceeds of Crime Risk

Finova applies a risk-based and proportionate approach to proceeds of crime risk, recognising that such risk may arise in different forms depending on the nature of the asset, the transaction structure, the jurisdictions involved, and the profile of counterparties.

Consideration of proceeds of crime risk is embedded into normal decision-making and forms part of Finova's broader financial crime and compliance framework. Finova does not treat this risk as theoretical or abstract; where there is reasonable concern that funds or assets may be derived from criminal conduct, engagement will not proceed.

### 3. How Proceeds of Crime Risk is Considered

Assessment of proceeds of crime risk begins at the earliest stage of engagement and continues throughout its lifecycle.

In practice, this includes consideration of:

- the origin and legitimacy of funds and assets involved,
- the commercial rationale and structure of the engagement,
- the jurisdictions connected to the activity, and
- the transparency and consistency of information provided.

Where information is incomplete, inconsistent, or cannot be reasonably verified, Finova will not proceed until sufficient clarity is achieved.

### 4. Governance and Oversight

Responsibility for managing proceeds of crime risk sits with Finova's management, supported by defined escalation and decision-making pathways.

Engagements presenting elevated or ambiguous proceeds of crime risk are subject to increased scrutiny and senior-level consideration. Where appropriate, Finova may seek external professional advice to inform its assessment.

Finova reserves the right to decline or disengage from any engagement where proceeds of crime risk cannot be adequately understood or mitigated.

## 5. Relationship to AML, Sanctions, and Financial Crime Controls

Proceeds of crime considerations are closely linked to anti-money laundering, counter-terrorist financing, and sanctions compliance.

This policy operates in conjunction with related policies, including:

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

Together, these policies support a coherent and integrated approach to financial crime risk management.

## 6. Alignment with Recognised Legal and Risk Principles

Finova's approach to proceeds of crime risk is informed by applicable legal frameworks and recognised financial crime risk principles, including those reflected in legislation and guidance across relevant jurisdictions.

Such references are intended to guide approach and judgement, without implying regulatory status, certification, or formal 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 approach to proceeds of crime risk evolves in response to legal developments, emerging typologies, and operational experience, and this policy will be updated where necessary to reflect that evolution.

 **End of Policy** 

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