

FIN-POL-006

Fraud Prevention Policy

*A Structured Approach to Identifying,
Preventing, and Responding to Fraud*

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, detecting, and responding to fraud in all its forms. Fraud undermines trust, exposes counterparties to harm, and presents legal, financial, and reputational risk. Preventing fraudulent activity is therefore a fundamental requirement of how Finova operates.

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

2. Our Approach to Fraud Risk

Finova recognises that fraud risk may arise from internal or external sources and may take different forms depending on the nature of the engagement, the assets involved, and the jurisdictions concerned.

Fraud risk is considered as part of Finova's broader risk management and financial crime framework. The firm adopts a preventative approach, prioritising transparency, verification, and control over reactive measures.

Finova does not tolerate fraudulent conduct and will not knowingly engage in activity where there is reasonable concern that fraud may be present.

3. How Fraud Risk is Considered and Managed

Fraud risk is assessed from the outset of any engagement and revisited as circumstances evolve.

In practice, this includes consideration of:

- the credibility and consistency of information provided,
- the commercial logic and structure of the engagement,
- the behaviour and track record of counterparties and intermediaries, and
- indicators of misrepresentation, deception, or concealment.

Where concerns arise, Finova will pause engagement, seek clarification, and apply enhanced scrutiny as appropriate. Engagement will not proceed where fraud risk cannot be adequately understood or mitigated.

4. Governance and Oversight

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

Matters presenting elevated or suspected fraud 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 refuse or disengage from any engagement where fraud risk is identified or reasonably suspected.

5. Relationship to Recognised Fraud Prevention Principles

Fraud risk is closely linked to anti-money laundering, proceeds of crime, sanctions, and broader compliance considerations.

This policy operates in conjunction with related policies, including:

- FIN-POL-003 – Anti-Money Laundering & Counter-Terrorist Financing,
- FIN-POL-004 – Sanctions Compliance, and
- FIN-POL-005 – Proceeds of Crime.

Together, these policies support a coherent approach to financial crime prevention, financing, and sanctions compliance.

6. Alignment with Recognised Legal and Risk Principles

Finova's approach to fraud prevention is informed by recognised fraud risk management and internal control principles, including those reflected in international guidance and professional standards.

Such references are intended to guide judgement and approach, without implying certification, registration, 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 approach to fraud prevention evolves in response to emerging typologies, operational experience, and changes in the risk landscape, and this policy will be updated where necessary to reflect that evolution.



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