

FIN-POL-007

Code of Conduct

*Defining the standards of behaviour
expected across Finova*

Finova Policy

Built on Integrity, Discipline and Trust

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Document Control

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1. Policy Statement

Finova expects the highest standards of professional conduct from all those acting on its behalf. How Finova conducts itself is as important as what it does. Integrity, discretion, and sound judgement underpin every engagement.

This Code of Conduct sets out the behavioural standards and expectations that apply to Finova's management, employees, contractors, and representatives.

2. Our Standard of Conduct

Finova conducts its activities honestly, lawfully, and responsibly. All actions taken on behalf of Finova must be consistent with applicable laws, ethical principles, and the firm's commitment to trust and market integrity.

Those acting for or representing Finova are expected to:

- act in good faith and with integrity at all times,
- exercise sound judgement and professional care, and
- avoid conduct that could undermine trust or confidence in Finova.

Conduct that prioritises personal gain, expediency, or improper advantage over lawful and ethical behaviour is not acceptable.

3. Professional Behaviour and Relationships

Finova values respectful, transparent, and professional relationships with counterparties, partners, and stakeholders.

All interactions should be conducted in a manner that:

- is fair and respectful,
- avoids misrepresentation or omission of material information, and
- reflects the seriousness and discretion appropriate to the nature of Finova's activities.

Finova does not tolerate intimidation, harassment, or inappropriate behaviour in any form.

4. Conflicts of Interest

Those acting on behalf of Finova must avoid situations where personal, financial, or other interests conflict, or appear to conflict, with Finova's interests.

Actual or potential conflicts must be disclosed promptly and managed appropriately. Where a conflict cannot be adequately managed, the individual concerned may be required to step back from the relevant engagement.

Further detail is set out in FIN-POL-009 – Conflicts of Interest Policy.

5. Integrity, Compliance and Lawful Conduct

All conduct must comply with applicable laws, regulations, and Finova policies, including those relating to:

- anti-money laundering and financial crime,
- sanctions and trade restrictions,
- fraud prevention, and
- data protection and information security.

Finova will not engage in activity that seeks to circumvent legal or regulatory requirements, regardless of commercial opportunity.

6. Governance and Oversight

Responsibility for upholding this Code of Conduct sits with Finova's management, supported by appropriate oversight and escalation mechanisms.

Breaches of this Code may result in disciplinary action, disengagement, or other appropriate response, depending on the circumstances.

Finova reserves the right to refuse or terminate engagement where conduct falls below expected standards.

7. Alignment with Recognised Ethical Principles

This Code of Conduct is informed by recognised principles of ethical business conduct and corporate governance, as reflected in international guidance and professional standards.

References to such principles are intended to guide behaviour and judgement, without implying certification or formal accreditation.

8. Review and Continuous Improvement

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

Finova expects those acting on its behalf to remain aware of, and adhere to, the standards set out in this Code.

 End of Policy 

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