



FIN-POL-008

# Business Ethics Policy

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*Defining the standards of behaviour  
expected across Finova*

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## Finova Policy

*Built on Integrity, Discipline and Trust*

December 2025



Finova Trading FZE LLC

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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 conducting its business ethically, responsibly, and with integrity in all circumstances. Ethical behaviour is fundamental to maintaining trust, protecting reputation, and sustaining long-term relationships with counterparties, partners, and stakeholders.

This policy sets out the ethical principles that guide how Finova conducts its activities and makes decisions.

### 2. Our Ethical Principles

Finova's business decisions and actions are guided by a clear set of ethical principles, including:

- honesty and transparency in all dealings,
- fairness in how counterparties and partners are treated,
- accountability for decisions and outcomes, and
- respect for applicable laws, regulations, and cultural norms.

Finova does not pursue opportunity at the expense of ethical conduct, regardless of potential commercial benefit.

### 3. Ethical Decision Making in Practice

Ethical considerations are embedded into Finova's day-to-day decision-making rather than treated as an abstract concept.

In practice, this means that Finova:

- considers not only whether an action is lawful, but whether it is appropriate,
- avoids structures or behaviours designed to mislead, obscure, or circumvent obligations, and
- expects openness and good faith from those with whom it engages.

Where ethical concerns arise, Finova will pause engagement, seek clarification, and apply appropriate judgement before proceeding.

### 4. Gifts, Hospitality and Improper Advantage

Finova does not offer, solicit, or accept gifts, hospitality, or other benefits where doing so could improperly influence, or appear to influence, business decisions.

Any gifts or hospitality must be modest, infrequent, and consistent with accepted business practice. Improper inducements, facilitation payments, or attempts to gain unfair advantage are not tolerated.

Further detail is set out in FIN-POL-010 – Gifts, Hospitality & Anti-Bribery Policy.

## 5. Relationships and Fair Dealing

Finova seeks to build relationships based on trust, mutual respect, and clear expectations.

All parties acting on behalf of Finova are expected to:

- deal fairly and honestly with counterparties,
- avoid misrepresentation or omission of material information, and
- conduct themselves in a manner that reflects professionalism and discretion.

Unethical behaviour by counterparties or partners may result in refusal to engage or disengagement.

## 6. Governance and Accountability

Responsibility for ethical conduct sits with Finova's management, supported by oversight and escalation mechanisms.

Concerns relating to unethical behaviour are taken seriously and will be reviewed appropriately. Where ethical standards are not met, Finova may take corrective action, including disengagement or referral to relevant authorities where required.

## 7. Alignment with Recognised Ethical Principles

Finova's ethical approach is informed by recognised principles of ethical business conduct and corporate responsibility, as reflected in international guidance and professional standards.

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

## 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.

Finova expects those acting on its behalf to understand and uphold the ethical principles set out in this policy at all times.



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