



FIN-POL-009

Conflicts of Interest Policy

*A structured approach to identifying,
disclosing, and managing conflicts of
interest*

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 identifying, disclosing, and managing conflicts of interest in a transparent and responsible manner. Conflicts, whether actual, potential, or perceived, can undermine trust and impair objective decision-making if not properly addressed.

This policy sets out how Finova approaches conflicts of interest to ensure that decisions are made fairly, independently, and in the best interests of the firm and its stakeholders.

2. Our Approach to Conflicts of Interest

Finova recognises that conflicts of interest may arise in the normal course of business, particularly given the nature of its activities, relationships, and networks.

The firm adopts a proactive and disclosure-led approach, recognising that early identification and transparent handling of conflicts is essential. Conflicts are not judged solely by intent, but by how they may reasonably be perceived by others.

Finova does not allow conflicts to compromise integrity, judgement, or the proper conduct of its activities.

3. Identifying and Disclosing Conflicts

Those acting on behalf of Finova are expected to remain alert to situations where personal, financial, or other interests could conflict, or appear to conflict, with Finova's interests.

Examples may include:

- personal or financial interests in counterparties or transactions,
- relationships that could influence, or appear to influence, decision-making, and
- multiple roles or obligations that may create competing interests.

Actual or potential conflicts must be disclosed promptly so they can be assessed and addressed appropriately.

4. Managing Conflicts in Practice

Once identified, conflicts are assessed on a case-by-case basis to determine whether they can be appropriately managed.

Management measures may include:

- transparency and disclosure to relevant parties,
- recusal from decision-making or specific activities,
- additional oversight or controls, or
- refusal to proceed where a conflict cannot be adequately managed.

Where conflicts cannot be mitigated to an acceptable level, Finova will not proceed with the engagement.

5. Governance and Oversight

Responsibility for conflicts of interest management sits with Finova's management, supported by appropriate oversight and escalation mechanisms.

Matters involving significant or sensitive conflicts are subject to senior-level consideration. Decisions are documented to ensure transparency and accountability.

Failure to disclose a conflict, or attempting to conceal one, may result in disciplinary action, disengagement, or other appropriate response.

6. Relationship to Ethical and Conduct Standards

This policy operates in conjunction with related policies, including:

- FIN-POL-007 – Code of Conduct, and
- FIN-POL-008 – Business Ethics Policy.

Together, these policies support a consistent and principled approach to integrity and ethical conduct.

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 expects those acting on its behalf to understand their obligations under this policy and to act transparently and responsibly at all times.



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