



FIN-POL-010

Gifts, Hospitality & Anti-Bribery Policy

A clear framework for preventing bribery and improper influence.

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 conducting its business with integrity and without improper influence. Bribery, facilitation payments, and improper inducements undermine trust, distort decision-making, and expose all parties to serious legal and reputational risk.

This policy sets out Finova's approach to gifts, hospitality, and anti-bribery, and the standards expected of all those acting on its behalf.

2. Our Approach to Gifts, Hospitality and Anti-Bribery

Finova adopts a zero-tolerance approach to bribery and corruption in any form. Business decisions must be made solely on merit, free from improper influence or expectation of advantage.

Gifts and hospitality may be offered or accepted only where they are modest, proportionate, infrequent, and consistent with accepted business practice. They must never be used to influence, or appear to influence, a business decision or outcome.

Finova does not permit facilitation payments or any other form of improper inducement, regardless of local custom or perceived commercial pressure.

3. How this is Applied in Practice

In practice, this means that Finova:

- does not offer, request, or accept anything of value intended to secure an improper advantage,
- exercises caution when offering or accepting gifts or hospitality, particularly where timing or context could create concern, and
- avoids arrangements that could reasonably be perceived as creating obligation or expectation.

Where there is uncertainty as to whether a gift or hospitality is appropriate, it should not be offered or accepted.

4. Third Parties and Intermediaries

Finova recognises that bribery and corruption risk often arises through third parties, including intermediaries, agents, or partners.

Those acting on behalf of Finova must not engage in conduct that Finova itself would not undertake. Finova will not engage with third parties where there is reasonable concern regarding improper conduct, inducements, or unethical behaviour.

5. Governance and Oversight

Responsibility for oversight of gifts, hospitality, and anti-bribery compliance sits with Finova's management.

Concerns or potential breaches must be escalated promptly. Where appropriate, Finova may pause engagement, seek clarification, or disengage entirely.

Breaches of this policy may result in disciplinary action, termination of engagement, or referral to relevant authorities where required.

6. Relationship to Ethical and Compliance Policies

This policy operates in conjunction with related policies, including:

- FIN-POL-007 – Code of Conduct,
- FIN-POL-008 – Business Ethics Policy, and
- FIN-POL-009 – Conflicts of Interest Policy.

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

7. Alignment with Recognised Anti-Bribery Principles

Finova's approach to anti-bribery and corruption is informed by recognised international anti-bribery principles and legal frameworks, including those reflected in legislation and guidance across relevant jurisdictions.

Such references guide approach and judgement, without implying certification, registration, 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 all those acting on its behalf to understand and adhere to the standards set out in this policy at all times.



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