

FIN-POL-014

Records and Information Management Policy

*A structured approach to creating, retaining,
and managing records.*

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 maintaining accurate, reliable, and appropriately managed records and information. Effective records and information management supports lawful conduct, sound decision-making, transparency, and accountability.

This policy sets out how Finova approaches the creation, retention, protection, and disposal of records and information across its activities.

2. Our Approach to Records and information Management

Finova adopts a proportionate and risk-based approach to records and information management, recognising that not all information carries the same sensitivity, value, or retention requirement.

Records are created and maintained to support legitimate business needs, legal and regulatory obligations, and effective governance. Information is managed in a manner that balances accessibility with confidentiality and security.

Finova does not retain information unnecessarily, nor does it dispose of information prematurely where retention is required.

3. How Records and Information are Managed

In practice, Finova:

- creates records that accurately reflect decisions, engagements, and transactions,
- stores records in a manner that protects confidentiality, integrity, and availability,
- restricts access to information on a need-to-know basis, and
- retains records for appropriate periods having regard to legal, regulatory, and business requirements.

Records may be held in physical or electronic form and include correspondence, agreements, due diligence materials, transactional records, and governance documentation.

4. Retention and Disposal

Retention periods are determined by reference to applicable legal, regulatory, and operational requirements, as well as the nature of the information concerned.

When records are no longer required, they are disposed of securely and responsibly to prevent unauthorised access, disclosure, or misuse. Disposal is carried out in a manner consistent with information security and data protection principles.

5. Third Parties and Information Handling

Finova recognises that records and information may be shared with third parties in the course of legitimate business activity.

Information is shared only where there is a clear business need and appropriate safeguards are in place. Finova will not engage with third parties where records or information cannot be managed securely and responsibly.

6. Governance and Oversight

Responsibility for records and information management sits with Finova's management, supported by appropriate oversight and escalation mechanisms.

Concerns relating to record accuracy, availability, security, or retention are addressed promptly. Where necessary, Finova may seek external professional advice to ensure appropriate handling of records and information.

7. Alignment with Recognised Information Management Principles

Finova's approach to records and information management is informed by recognised information governance and records management principles, including those reflected in international standards and professional guidance.

Such references guide approach 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.

As legal requirements, technology, and operational practices evolve, Finova's approach to records and information management will adapt accordingly, and this policy will be updated where necessary.



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