

FIN-POL-016

Third-Party and Partner Management Policy

*A structured approach to assessing and
managing third-party risk*

Finova Policy

Built on Integrity, Discipline and Trust

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Finova Trading FZE LLC

Call & WhatsApp: +971 56 126 2623 ❖ +44 7714 612701

Email: info@finovatrading.com

Web: <https://finovatrading.com>

Document Control

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1. Policy Statement

Finova works with third parties and partners where doing so supports client outcomes and complements Finova's core capabilities. Such relationships can introduce additional risk and dependency if not managed appropriately.

This policy sets out how Finova selects, engages, and oversees third parties and partners to ensure alignment with Finova's standards of integrity, compliance, and professionalism.

2. Our Approach to Third-Party and Partner Engagement

Finova adopts a selective, risk-based, and purpose-driven approach to third-party and partner engagement.

Third parties are engaged only where there is a clear and legitimate business rationale. Engagement is not undertaken to outsource accountability or to circumvent Finova's own standards, policies, or obligations.

Finova expects third parties and partners to operate to standards that are consistent with Finova's own approach to ethics, compliance, confidentiality, and lawful conduct.

3. Selection and Assessment

Before engaging a third party or partner, Finova considers:

- the nature and scope of the proposed relationship,
- the role the third party will play in relation to Finova's activities,
- the jurisdictional and regulatory context, and
- the third party's reputation, capability, and alignment with Finova's values.

The level of assessment applied is proportionate to the level of risk and dependency involved.

4. Ongoing Oversight and Relationship Management

Third-party and partner relationships are subject to ongoing oversight appropriate to their role and risk profile.

In practice, this includes:

- maintaining clarity as to roles, responsibilities, and boundaries,
- monitoring performance and conduct where appropriate, and
- reassessing risk where circumstances change.

Finova retains responsibility for its own conduct and decisions and does not rely on third parties to manage or absorb risk on its behalf.

5. Compliance, Confidentiality and Conduct

Third parties and partners engaged by Finova are expected to:

- comply with applicable laws and regulations,
- respect confidentiality and information security requirements, and
- conduct themselves ethically and professionally.

Finova will not continue relationships where conduct falls below acceptable standards or where risk cannot be adequately managed.

6. Governance and Oversight

Responsibility for third-party and partner management sits with Finova's management, supported by appropriate oversight and escalation mechanisms.

Where concerns arise, Finova may pause, review, or terminate a relationship as appropriate. Decisions are made with reference to risk, integrity, and the interests of Finova and its stakeholders.

7. Relationship to Other 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-002 – Compliance Framework.

Together, these policies support a coherent approach to responsible third-party engagement.

8. Alignment with Recognised Governance Principles

Finova's approach to third-party and partner management is informed by recognised governance and risk management principles, including those reflected in international guidance and professional standards.

Such references guide approach and judgement, without implying certification or formal accreditation.

9. 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 Finova's operating model and partnerships evolve, this policy will be updated where necessary to reflect changes in risk and practice.



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