

FIN-POL-017

Engagement Acceptance and Refusal Policy

Defining how engagements are accepted, declined, or discontinued

Finova Policy

Built on Integrity, Discipline and Trust

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Document Control

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1. Policy Statement

Finova is selective in the engagements it accepts and disciplined in the decisions it makes to proceed, pause, or decline. Not every opportunity is appropriate, and responsible engagement requires judgement, discretion, and adherence to clear standards.

This policy sets out how Finova determines whether to accept, continue, or refuse an engagement, and the principles that guide those decisions.

2. Our Approach to Engagement Decisions

Finova adopts a principles-led and risk-aware approach to engagement acceptance.

Decisions are informed by an assessment of legal, regulatory, financial crime, reputational, operational, and ethical considerations. Commercial opportunity alone is not sufficient to justify engagement.

Finova recognises that declining or disengaging from an opportunity is sometimes necessary to protect the firm, its stakeholders, and the integrity of the markets in which it operates.

3. How Engagements are Assessed

Assessment of an engagement begins at the earliest stage of interaction and continues throughout its lifecycle.

In practice, Finova considers:

- the nature and legitimacy of the proposed activity,
- the identity, behaviour, and transparency of counterparties and intermediaries,
- jurisdictional exposure and regulatory alignment,
- financial crime, sanctions, and proceeds of crime risk, and
- alignment with Finova's values, policies, and areas of focus.

Where information is incomplete, inconsistent, or withheld, engagement will not proceed until sufficient clarity is achieved.

4. Refusal and Disengagement

Finova will refuse or disengage from an engagement where:

- legal or regulatory alignment cannot be reasonably established,
- financial crime or sanctions risk cannot be adequately understood or mitigated,
- conduct falls below expected ethical or professional standards, or
- continued engagement presents unacceptable reputational or operational risk.

Refusal or disengagement may occur at any stage and does not require justification beyond Finova's assessment of risk and alignment.

5. Discretion and Communication

Engagement decisions, including refusals and disengagements, are handled discreetly and professionally.

Finova does not disclose the internal rationale for acceptance or refusal decisions beyond what is appropriate or required. Communications are managed to maintain confidentiality and avoid unnecessary escalation or exposure.

6. Governance and Oversight

Responsibility for engagement acceptance and refusal sits with Finova's management, supported by appropriate oversight and escalation mechanisms.

Engagements presenting elevated or non-standard risk are subject to increased scrutiny and senior-level consideration. Decisions are documented to support transparency and accountability.

7. Relationship to other Policies

This policy operates in conjunction with related policies, including:

- FIN-POL-001 – Risk Management,
- FIN-POL-002 – Compliance Framework, and
- FIN-POL-003 to FIN-POL-006 – Financial Crime and Fraud Policies.

Together, these policies support disciplined and responsible engagement decisions.

8. Alignment with Recognised Governance Principles

Finova's approach to engagement acceptance and refusal is informed by recognised governance, risk, and compliance principles, including those reflected in international guidance and professional standards.

Such references guide judgement and decision-making, 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.

Finova's engagement criteria and decision-making approach evolve as its activities and risk profile change, and this policy will be updated where necessary.



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