

FIN-POL-019

Modern Slavery and Human Trafficking Policy

*A commitment to preventing modern slavery
and human trafficking*

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 preventing modern slavery, forced labour, human trafficking, and related abuses in all forms. Such practices are incompatible with Finova's values, undermine human dignity, and present serious legal, ethical, and reputational risk.

This policy sets out how Finova approaches modern slavery and human trafficking risk across its activities, relationships, and supply chains.

2. Our Approach to Modern Slavery Risk

Finova adopts a risk-based and proportionate approach to identifying and addressing modern slavery and human trafficking risk, recognising that such risk may arise indirectly through counterparties, partners, or supply chains.

Consideration of modern slavery risk is integrated into Finova's broader governance, compliance, and engagement decision-making. Finova does not tolerate practices that exploit individuals or deny fundamental rights, regardless of jurisdiction or local custom.

3. How Risk is Identified and Considered

Modern slavery risk is considered at the outset of engagement and reviewed as relationships evolve.

In practice, Finova considers:

- the nature of the goods, services, or assets involved,
- the jurisdictions connected to an engagement,
- the structure and transparency of supply chains, and
- the conduct and practices of counterparties and partners.

Where risk indicators are present, Finova applies enhanced scrutiny and seeks additional assurance before proceeding.

4. Expectations of Counterparties and Partners

Finova expects counterparties, partners, and third parties acting on its behalf to operate lawfully and ethically, including respecting fundamental human rights.

Finova will not knowingly engage in activities where there is reasonable concern that modern slavery or human trafficking may be present and cannot be adequately addressed. Where concerns arise during an engagement, Finova may pause, investigate, or disengage as appropriate.

5. Governance and Oversight

Responsibility for oversight of modern slavery and human trafficking risk sits with Finova's management, supported by appropriate escalation and review mechanisms.

Concerns relating to potential exploitation, forced labour, or human trafficking are treated seriously and addressed promptly. Where appropriate, Finova may seek external professional advice to inform its assessment or response.

6. Relationship to Other Policies

This policy operates in conjunction with related policies, including:

- FIN-POL-002 – Compliance Framework,
- FIN-POL-016 – Third-Party & Partner Management, and
- FIN-POL-017 – Engagement Acceptance & Refusal.

Together, these policies support a responsible and ethical approach to engagement and supply chain management.

7. Alignment with Recognised Human Rights Principles

Finova's approach to modern slavery and human trafficking is informed by recognised international human rights and responsible business principles, 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.

As awareness of modern slavery risks and best practices evolves, Finova's approach will adapt accordingly, and this policy will be updated where necessary.



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