

<p><b>Application of Policy:</b></p>	<p>Global</p> <p>This Policy sets out the minimum requirements for the Group and applies to all Personnel and every member of the Group. Where the Group operates in a jurisdiction that imposes a higher standard, or a member of the Group has adopted its own policy which adopts a higher standard, those local standards or the local policy are deemed to be incorporated into and supplement this Policy and in the event of conflict supersede this Policy.</p>
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**Definitions:** Capitalised terms used throughout this Policy are defined in paragraph 7.

## 1. Overview

Oversight, risk management and internal control are key elements of good corporate governance. This Policy describes the manner in which the Group identifies, assesses, monitors and manages risk.

## 2. Responsibility

The Board determines the Group’s “risk profile” and is responsible for overseeing and approving risk management strategy and policies, internal compliance and internal control. This includes internal controls to deal with both the effectiveness and efficiency of significant business processes. It also includes the safeguarding of assets, the maintenance of proper accounting records and the reliability of financial and non-financial information.

The Board has delegated to the Audit and Risk Committee responsibility for implementing the Group’s risk management framework. Among other things, the Audit and Risk Committee is responsible for:

- (a) overseeing the Group’s risk management systems, practices and procedures to ensure effective risk identification and management and compliance with internal guidelines including the Board’s risk appetite;
- (b) assisting the Board and management to determine whether the Group has any material exposure to Environmental and/or Social Risks (as those terms are defined in the Corporate Governance Principles and Recommendations published by the ASX Corporate Governance Council) and, if it does, how the Group manages, or intends to manage, those risks;

- (c) assisting management to determine the key risks to the businesses and to prioritise work to manage those risks;
- (d) reviewing internal control systems, risk management systems and policies and compliance with legislative and other statutory requirements;
- (e) reviewing the adequacy of risk reporting to the Board, including reporting on new and emerging risks faced by the Company, including in relation to digital disruption, cyber security, privacy and data breaches;
- (f) making recommendations to the Board concerning any recommended changes to the Company's risk management framework or to the risk appetite set by the Board.

Where appropriate, the Audit and Risk Committee will submit particular risk management matters to the Board for its approval or review.

Responsibility for the implementation of the Group's risk management processes and practices is delegated to management.

### 3. Risk Management Processes and Practices

When developing its risk management processes and practices the Group will refer to the principles of AS/NZS ISO 31000:2018 and the ASX Corporate Governance Principles and Recommendations.

The Group's process of risk management and internal compliance and control includes:

- (a) identifying and measuring risks that might impact upon the achievement of the Group's strategy and objectives, and monitoring the environment for emerging factors and trends that affect these risks;
- (b) formulating risk management strategies to manage identified risks, and designing and implementing appropriate risk management policies and internal controls; and
- (c) monitoring the performance of, and improving the effectiveness of, risk management systems and internal compliance and controls, including regular assessment of the effectiveness of risk management and internal compliance and control.

To this end, the Company has practices directed towards achieving the following objectives:

- (a) compliance with applicable laws and regulations;
- (b) preparation of reliable published financial information; and
- (c) implementation of risk transfer strategies where appropriate (e.g. insurance).

### 4. Assessment

Responsibility for undertaking and assessing risk management and internal control effectiveness is delegated to management. Management is required to assess risk management and associated internal compliance and control procedures and report back regularly to the Audit and Risk Committee.

The Board will review assessments of the effectiveness of risk management and internal compliance and control at least annually.

**5. Training and Monitoring**

The Group will provide initial training in relation to this Policy and thereafter on a periodic basis. The Group will put in place compliance and monitoring programs to review the Group’s compliance with the requirements of this Policy.

**6. Review and Amendment of this Policy**

This Policy will be reviewed periodically by the Board to check that it is operating efficiently and whether any changes are required.

Any amendments to this Policy, other than updates for changes in the Company’s branding or position titles, must be approved by the Board.

**7. Definitions**

Defined terms used in this Policy have the following meanings:

<b>Term or Abbreviation</b>	<b>Definition and Explanation</b>
<b>Board</b>	means the board of directors of the Company.
<b>Company</b>	means Omni Bridgeway Limited (ABN 45 067 298 088).
<b>Group</b>	means the Company and its related bodies corporate (as that term is defined in section 9 of the Corporations Act 2001 (Cth)).
<b>Policy</b>	means this risk management policy.

**This Policy was approved by the Board to be effective on 26 June 2020.**