



Risk Management Policy

DOCUMENT MANAGEMENT

Date	Version	Comment
September 2018	1.0	New document.
November 2020	2.0	No changes.
October 2021	3.0	No changes.
December 2022	4.0	<ul style="list-style-type: none">• Updated business description;• Minor amendments and simplification of wording.
December 2023	5.0	<ul style="list-style-type: none">• Update Policy format and wording to align with Superloop Compliance Management Policy;• Minor wording updates.

1. CONTEXT

Founded in 2014 and listed on the Australian Securities Exchange (ASX) since 2015, Superloop's purpose is to enable better internet for Australian homes and businesses. Superloop enables challenger retail brands (including Superloop and Exetel brands) to take a larger share of the market, leveraging Superloop's Infrastructure-on-Demand platform.

Superloop provides connectivity and services to customers in three segments of the market: consumer, business and wholesale. Superloop's offerings leverage Superloop's investments in physical infrastructure assets that include fibre, subsea cables and fixed wireless, as well as Superloop's software platforms. Hundreds of thousands of homes and businesses rely on Superloop and Exetel every day for their connectivity needs.

Risk is inherent in all our business activities and effective risk management is crucial to achieving Superloop's objectives. Effective risk management provides the business with insights to support effective forward looking decision making and competitor advantage.

2. OBJECTIVES

Superloop is committed to ensuring that all risks are effectively managed to support it in achieving its strategic objectives.

Key Policy objectives:

- **Promoting an enterprise-wide approach** to risk management by integrating it with:
 - Organisational strategy and decision-making;
 - Superloop's Compliance Management Policy;
 - Board oversight activities, including the role of the Board Risk and Compliance Committee (RCC); and
 - Governance, Risk and Compliance systems.

- **Developing and maintaining a positive risk culture** within the business:
 - Clearly defined roles, responsibilities and performance expectations;
 - Provision of risk training and awareness activities; and
 - Maintaining adequate resources to effectively manage risks.
- **Ensure risks** that have the potential to affect the achievement of the organisation's strategic objectives are identified and managed in accordance with the organisation's risk appetite.
- **Enabling the design and implementation of controls** that are:
 - Cost effective;
 - Designed effectively;
 - Documented; and
 - Periodically reviewed for effectiveness.
- **Providing timely and accurate monitoring, review and continual improvements** to improve business decision making and performance.

3. IMPLEMENTATION

To support the achievement of the Policy's objectives, Superloop has in place a Risk Management Framework (RMF) which is comprised of documents, tools, people and processes to support the management of risk. The RMF is consistent with the principles outlined in *ISO31000: Risk Management – Guidelines* and ASX related governance requirements.

4. SCOPE

This Policy applies to all directors, employees and contractors of the Superloop Group.

5. ROLES AND RESPONSIBILITIES

Role	Responsibilities
The Board	<ul style="list-style-type: none">• Approving the Policy.
Board Risk and Compliance Committee (RCC)	<ul style="list-style-type: none">• Ensure a process is in place to identify material risks to the Group including review, ratification and assessment of the integrity of the Company's systems of risk management, legal compliance, and control; and• Review the Group's RMF and monitor its implementation.
Executive Team	<ul style="list-style-type: none">• Setting the foundation for a strong risk culture; and• Maintaining compliance with the Policy, including management of risks relevant to their respective team's operations.
Compliance, Risk and Regulatory Team	<ul style="list-style-type: none">• Maintenance of the Policy;• Facilitating the identification, monitoring, assessment and reporting of Superloop's risks;• Development and implementation of the Superloop controls assurance program;• Reporting to the RCC;• Maintenance and support of Superloop's Governance, Risk and Compliance systems;• Development and implementation of risk management training and awareness activities.
All staff	<ul style="list-style-type: none">• Understanding, implementing and adhering to this Policy;• Adherence to the RMF;• Report and escalate risk concerns, issues and breaches;• Participation in risk and compliance management training and awareness activities.

6. RELATED DOCUMENTS

- Superloop Compliance Management Policy;
- Superloop Risk Appetite Statement;
- Superloop Risk Management Standard.

7. FURTHER ASSISTANCE

Further information can be obtained by contacting the Head of Compliance, Risk and Regulatory.

8. REVIEW

The Board will review this Policy annually.