

Risk Management Policy

Version 1.1

Effective Date: 21 October 2025

1. Purpose

This policy sets out the objectives and accountabilities for the management of risk within Sigma Healthcare Limited (Sigma).

2. Scope

This policy is applicable across all Sigma operations and extends to Sigma and its subsidiaries, including their respective Directors, employees, and contractors. Compliance with this policy is mandatory for all individuals engaged in Sigma's business activities.

3. Definitions

- Sigma:** Sigma Healthcare Limited and all 100%-owned Sigma businesses.
- Team member:** Any Sigma employee.
- RCSC:** Risk, Compliance and Sustainability Committee, a subcommittee of the Board responsible for oversight of risk management.

4. Policy

4.1 Policy Statement

Sigma recognises that managing risk is a cornerstone of good governance and essential to achieving both our strategic and operational objectives. When managed effectively, risk management strengthens decision-making, highlights opportunities, and reduces the impact of events that could undermine shareholder value.

Effective risk management is a source of insight and competitive advantage. Sigma is committed to the ongoing development of a strategic and consistent enterprise-wide risk management programme, to ensure the significant risks we face are appropriately identified, treated, assessed, and monitored.

This policy is not designed to promote risk avoidance, rather Sigma's approach is to create a risk conscious culture that encourages the systematic identification, management and control of risks whilst ensuring we do not enter into unnecessary risks or enter risks unknowingly.

Every person at Sigma has a part to play. Through smart risk management, we can turn challenges into opportunities, driving sustainable growth and creating value for customers and shareholders alike.

4.2 Objectives of Risk Management

Our approach to risk management is guided by the following objectives:

- Safeguarding the company's assets – human, capital, property, reputation, knowledge, and data.
- Fostering a culture that is risk conscious and supported by high standards of accountability at all levels.
- Achieving an integrated risk management approach where risk forms part of all organisational processes and leads to enhancement of shareholder value.
- Supporting effective decision making through better understanding and consideration of risk exposures.

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- Building a sustainable business for the longer term.
- Improving stakeholder confidence and trust.
- Improving risk-adjusted returns.
- Enhancing organisational efficiencies.
- Enabling the Board to fulfil its governance and compliance requirements.

4.3 Risk Management Methodology

Sigma has adopted an enterprise-wide risk management process. This incorporates a system of risk oversight, risk management, and internal control designed to identify, assess, monitor, and manage risks consistent with *AS/NZS ISO 31000:2018 Risk Management - Guidelines*.

4.4 Risk Management Model

Risk management at Sigma is a collective responsibility, supported at all organisational levels. Our model is based on a “three lines” approach:



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4.5 Responsibilities

Responsibility for risk management is shared across our organisation. Key responsibilities include:

Board

- Holds ultimate responsibility for organisational risk management, including approval of the risk management policy, setting risk appetite, and overseeing Management's risk management framework.
- Responsible for the overall internal control framework and for reviewing its effectiveness.
- Delegates responsibilities for risk and compliance management to relevant Board subcommittees (e.g., the Risk, Compliance and Sustainability Committee (RCSC)).

Risk, Compliance and Sustainability Committee (RCSC)

- Oversees and manages Sigma's risk management programme in accordance with the RCSC Charter.
- Assists the Board in overseeing the group's risk profile and is responsible for overseeing management's actions in the identification, management, and reporting of material business risks.
- Supports the Board to:
 - Fulfil oversight responsibilities for the financial reporting process and associated internal controls.
 - Oversee external and internal audit activities.
 - Monitor compliance with laws and regulations.
 - Review and recommend the Risk Management Policy and Framework.
 - Review the adequacy of Sigma's insurance policies.

Internal Audit

- Oversees the performance of outsourced internal auditors to provide independent examinations and evaluations of risk mitigation plans.
- Provides independent assurance to the executive group and Board in accordance with agreed audit plan scoping.

Senior Management

- Actively identifies risks and implements mitigation measures.
- Periodically reviews the group's risk profile and reports to RCSC on the effectiveness of the risk management framework and the company's management of its material business risks.
- Advises the Board of any areas of material non-compliance with laws and regulations. Formal compliance reporting is tabled at every RCSC.
- Assists the Board with documentation of material risks, corporate governance, environmental and social statements included in the Directors Report and statutory reporting.

All Employees

- Each of us is responsible for the effective identification, management, reporting, and control of risk within our areas of responsibility, and for developing a risk-conscious culture.

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5. Breach of Policy

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment or engagement. Our intent is to ensure that all team members understand the importance of risk management and the consequences of non-compliance, which may impact both individual and organisational outcomes.

6. Disclaimer

This policy is provided for guidance and does not form part of any contract of employment. Sigma reserves the right to amend this policy at any time.

7. Document control and related documents

Name of Document	Risk Management Policy
Document Author	General Manager, Finance
Document Approver	Risk, Compliance & Sustainability Committee
Document Reviewers	Risk, Compliance & Sustainability Committee
Review Period	This policy will be reviewed every two (2) years or earlier if required by a change in circumstances.
Related Documents	<ul style="list-style-type: none"> • Risk Management Framework • Code of Conduct • Share Trading Policy • Fraud Policy • Continuous Disclosure Policy • Legal Engagement Policy • Privacy (Data Management) Policy • Tax Corporate Governance Policy and Framework • Whistle-Blower Policy • Delegated Authorities Policy • Retention of Records Policy

8. Policy Version Register

Version	Modified by	Description of changes	Authorised by	Effective date
1.1	21.10.2025	Approved	Board	21.10.2025