



Policy on Risk Management

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DOCUMENT CONTROL

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Supporting Documentation / References

The following documents are related to this document:

Document
TWHL Constitution
Charter of the Audit and Risk Committee

1 RISK MANAGEMENT

- 1.1 The Audit and Risk Committee ("**Committee**") is responsible for reviewing and monitoring the effectiveness of Trade Window Holdings Limited and its subsidiary companies ("**TradeWindow**" or the "**Company**") Risk Management Framework and the maintenance of an appropriate risk culture within TradeWindow. The Committee must also review risk capacity and exposure limits (risk appetite) and the alignment of TradeWindow's risk profile within limits set by the Board.
- 1.2 The Committee must regularly monitor and review the Company's material business risks and management of these risks as well as overseeing key risk-related processes and functions. The Committee must ensure the effectiveness of the risk-related processes and functions with respect to material business risks, as appropriate.
- 1.3 In carrying out these responsibilities, the Committee will:
- (a) review with management on a quarterly basis and with the internal auditor and external auditors on at least an annual basis, the significant risks within the Company's Risk Registers and review how they have been assessed and managed;
 - (b) assess the effectiveness of the related system of internal control in managing the significant risks, having regard to any significant failings or weaknesses in internal control that have been reported;
 - (c) consider whether necessary actions are being taken promptly to remedy any significant failings or weaknesses;
 - (d) consider whether the findings indicate a need for more extensive monitoring of the system of internal control;
 - (e) review accounting and financial human resources and succession planning within the Company;
 - (f) review the adequacy of insurance at each insurance renewal and recommend to the Board any significant changes to insurance cover; and
 - (g) consider the adequacy of business continuity planning.

2 IDENTIFIED RISKS

- 2.1 There are a number of risks that are inherent to the business activities that TradeWindow undertakes. These risks may change over time as the external environment changes and as TradeWindow expands its operations. The risk management process requires the regular review of the Company's existing risks and the identification of new and emerging risks facing the Company, including financial and non-financial matters. It also requires the management, including mitigation where appropriate, of these risks. At a minimum, risks identified across TradeWindow at an enterprise-wide level are reported to each meeting of the Committee.

3 POLICY REVIEW

- 3.1 The Board will review this policy as required and at least every two years.