

# Fintel

Our Code of Ethics





# We think bigger to deliver excellence



Fintel exists to inspire better outcomes by enabling retail financial services to operate more effectively and this purpose is shared across our family of brands.

As we work together to achieve our common goals, it is our shared responsibility to act honestly, fairly, inclusively and with complete integrity. Our strong ethical culture is paramount in maintaining the trust of our customers, colleagues, partners and wider communities, and we ask you to adhere to the guidance set out in this Code of Ethics, so that we can continue to inspire better outcomes and grow as a sustainable and responsible business, now and in the future.”



MATT TIMMINS & NEIL STEVENS  
Joint CEOs



NEIL STEVENS  
Joint CEO

MATT TIMMINS  
Joint CEO

## OUR CODE OF ETHICS

- We recognise that ethics and the law, although related, are not the same thing. The law sets out the minimum compulsory standard of behaviour and we will act in accordance with applicable laws and regulations governing our business.
- In addition, we articulate and live by our Code of Ethics which outlines the moral principles guiding our behaviour and judgments, helping us to determine what’s right and wrong.
- We are committed to carry out our business in an ethical manner. We do this by making choices that are ethically the right thing to do - we will be truthful, fair and responsible in all activities and relationships.
- Our employees are supported, and encouraged, to choose the ‘right’ path rather than one driven by pure financial motives. Our employees can safely report any concerns they have about compliance with law, our policies or this Code.



### WHO DOES THE CODE APPLY TO?

The Code of Ethics must be followed by anyone who works for or represents Fintel including directors, officers, employees, subsidiaries and controlled affiliates.

Consultants, independent contractors and suppliers are bound by our Supplier Code of Conduct

## Contents

02	INTRODUCTION FROM THE JOINT CEOs
04	OUR PURPOSE AND VALUES
05	ABOUT THE CODE
06	REPORTING CONCERNS
08	ANTI-BRIBERY AND CORRUPTION
09	ANTI-MONEY LAUNDERING
10	MARKET ABUSE AND INSIDER DEALING
10	CONFLICTS OF INTEREST
11	FACILITATION OF TAX EVASION
12	SUPPORTING OUR PEOPLE AND INTERACTING WITH OTHERS
13	HUMAN RIGHTS
14	COMPETITION LAW AND ANTI-TRUST
16	DATA PRIVACY
17	INFORMATION SECURITY
18	RESPONSIBLE USE OF COMPANY ASSETS
18	SOCIAL MEDIA
19	RISK MANAGEMENT





# Our purpose and values

Our purpose is to inspire better outcomes by empowering product providers, intermediaries and consumers, giving them the tools, the expertise and the knowledge they need to make better informed decisions.

To help us achieve that purpose, we are committed to promoting a strong ethical and values driven culture across Fintel with our people at the core of what we do.

Our core principles are broken down into the values that we bring to the industry: simplify complexity, think bigger and future focused, and the shared values that define our approach and our people: excellence, influence, and knowledge.

Underpinning that is our organisational DNA – the behaviours we share and encourage each day across Fintel to help us achieve our purpose:



## POSITIVE

We're fired up by challenges and believe in our ability to go beyond expectation. It's a can-do attitude that's helped us deliver an ever-widening range of positive solutions and outcomes to an ever-growing audience of financial providers and advisers.



## GROUNDED

We never get carried away with our own triumphs. We owe our success to the market that we serve, so continuing to do so to the best of our ability is how we express our pride.



## FOCUSED

We never lose sight of what's important and always look forward with clarity. It's what enables us to continuously grow stronger and achieve our goals whilst remaining focused on everyone we serve.



## INCLUSIVE

We know diversity of thought, opinion, skills and experience makes us a richer and more vibrant place to work. When people feel empowered to be the most authentic version of themselves, they become happier, more innovative and more productive. We welcome diversity and celebrate individuality.



## PASSIONATE

Our passion and energy fuels our drive to work hard, push limits and move fast for our clients. We love nothing more than lacing up our trainers to keep our clients up to speed and ahead of the curve in their markets.



## SUPPORTIVE

As natural team players who respect others' goals, we remain equally dedicated to the needs of our advisers, partners, investors and colleagues. We make the most of being at the centre of it all, providing stable foundations for everyone to prosper in the financial future.

# Our core values underpin our shared traits and approach.

It is harnessing our market-leading knowledge, influence and excellence, that we simplyfy complexity, think bigger and remain future-focused for our clients.



## KNOWLEDGE

We take the challenges our customers face and transform them into effective, relevant solutions which benefit everyone.



## INFLUENCE

We use our intelligence, awareness and experience to connect our clients with their customers and shape a better financial future.



## EXCELLENCE

We demand more of ourselves than our clients and ensure that our people and technology solutions are always the best available.



## SIMPLIFY COMPLEXITY

We understand the complicated nature of the financial world and help everyone create clear paths towards better outcomes.



## THINK BIGGER

We constantly explore new ideas with the interests of our clients and their customers at heart. Focusing through their lens inspires our thinking.



## FUTURE FOCUSED

We think ahead, rise to new challenges and break down future barriers to success. Our intuition helps clients maximise opportunities.





# ABOUT THE CODE

This Code of Ethics aims to help you understand and follow the basic compliance and ethics rules that apply to your role. It also advises you on when and how to raise questions. It applies to every member of staff working for any of our businesses.

The Code reflects our commitment to act ethically and legally. It does not describe every law and policy that might apply to every situation, and you must follow any additional business/compliance policies that apply to you.

The Board of Directors has overall responsibility for ensuring the Code complies with our legal and ethical obligations, and that all those under our control comply with it.

Fintel's Chief Operating Officer has primary and day-to-day responsibility for implementing this Code, monitoring its use and effectiveness, dealing with any queries about it and auditing internal control systems and procedures to ensure they are effective in managing ethics and conduct on behalf of Fintel.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this Code. Regular training on the individual policies referred to within the Code forms part of our mandatory compliance training calendar.

## YOUR RESPONSIBILITIES UNDER THE CODE

Every person that this Code applies to must:

- Read this Code of Ethics and understand how it applies to your job.
- Follow the compliance and ethics rules described in the Code.
- Be aware of and follow additional policies and laws that apply to your specific business, location or role.
- Ask questions if you are not sure how the Code applies to a particular situation or decision that you are facing.
- Report any violations or suspected violations you believe may have occurred.

By reading and following the Code, raising questions and reporting any illegal or unethical conduct, you are helping us to abide by our high ethical standards and our commitment to comply with the law.

You are invited to comment on this Code and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to Fintel's Chief Operating Officer.

## Reporting concerns

We promptly investigate suspected violations of the Code and take appropriate remedial actions when violations are discovered. This is important to protect staff, preserve our reputation, and avoid legal exposure.

We need your help in accomplishing this effort. If you learn about or suspect anyone has violated the Code or otherwise acted unethically or illegally, it is important that you promptly report your concerns by following our Whistleblowing process, available on our HR system, Cezanne.

It is important to report violations regardless of the identity or position of the suspected offender.

When an individual makes a disclosure, the Company will process any personal data collected in accordance with its Data Protection Policy. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

Retaliation in any form against an individual who sincerely believes a violation of the Code or law may have occurred and reports it, even if the report is mistaken, or who assists in the investigation of a reported violation, is itself a violation of the Code. Any member of staff responsible for any such retaliation will be subject to disciplinary action, up to and including termination.

### WHEN SHOULD I SPEAK UP?

Do you believe that the conduct may be illegal or violate the Code or other Company policies?

Do you believe that the conduct may be dishonest, unethical or unlawful?

Do you believe the conduct may damage the reputation of Fintel or any of its subsidiaries?

Do you believe the conduct could hurt others, for example our colleagues, customers, partners or investors?

If the answer is **“yes”** or even **“maybe”** please report your concerns by following our Whistleblowing process promptly, even if you don't have full information.





# Anti-bribery and corruption



Do not permit or engage in bribery or corruption of any kind.

## OUR STANCE:

- We have a zero-tolerance approach to bribery and corruption.
- We do not permit the use of facilitation payments and will not permit any such payments indirectly through an agent or intermediary or to a charity or political cause.
- We keep accurate books and records so that any payments are honestly described and not used for unlawful purposes.
- All charitable and political donations are subject to strict approval processes.
- Any gifts/hospitality either given or received are subject to strict policies and controls.

To comply with bribery laws, and this Code, you must:

- Read, understand and comply with our anti-bribery and corruption policy, available on our HR system, Cezanne.
- Not solicit, accept, offer or give gifts or hospitality that may influence or appear to influence the recipient's ability (or any relevant third party's ability) to make objective business decisions.
- Not solicit, offer or receive any gift or hospitality that is in breach of relevant law or our anti-bribery and corruption policy.
- Not make a charitable or political donation that is in breach of relevant law or our charitable or political donations policy, available on our HR system, Cezanne.
- Report any concerns of non-compliance promptly using the reporting procedures detailed within the anti-bribery and corruption policy.

## WHAT YOU SHOULD KNOW

**"Bribery"** means giving, offering or promising anything of value to gain an improper business advantage.

**"Facilitation payments"** are small customary amounts paid to government employees to expedite routine clerical or administrative actions such as issuing permits.

**Q:**

My colleague received a hamper from one of our suppliers last week, it must have been worth at least £200 and even had a prepaid visa card in there. I know the supplier is bidding for a big contract with us. When I asked my colleague about it, they said they weren't going to report it as a gift as it was addressed to them personally. What should I do?

**A:**

This gift is clearly above what is permitted by our gifts and hospitality policy and could well be construed as a bribe to win the contract. You should report your suspicions to your manager or Fintel's Chief Operating Officer immediately. You can do this anonymously if you wish and you will be protected from any possible recrimination for reporting in good faith.

# Anti-money laundering



Do not accept any cash payments from individuals or organisations. If you have reasonable grounds to suspect money laundering activities or proceeds of crime, or are simply suspicious, promptly report the matter to the Money Laundering Reporting Officer.

## OUR STANCE:

We established internal procedures to prevent the use of our services for money laundering.

We are committed to:

- Preventing Fintel and our employees from being exposed to money laundering.
- Identifying the risks where they may occur.
- Complying with legal and regulatory requirements, especially with regard to reporting suspected cases.

To comply with Money Laundering laws (including The Proceeds of Crime Act 2002, the Terrorism Act 2000 and the Money Laundering Regulations 2007) and this Code, you must:

- Read, understand and comply with our anti-money laundering policy and procedures, available on our HR system, Cezanne.
- Not accept payments in cash (including notes, coins or travellers' cheques in any currency) from individuals or organisations.
- Promptly report the matter to the Money Laundering Reporting Officer (the officer nominated to receive disclosures about money laundering activity is Fintel's Chief Operating Officer) if you have reasonable grounds to suspect money laundering activities or proceeds of crime or are simply suspicious.

## WHAT YOU SHOULD KNOW

**"Money laundering"** is the process where criminals attempt to hide and change the true identity of the proceeds of their crime so that they appear legitimate. The various stages are termed placement, layering and integration:

**"Placement"** - 'dirty money' is placed directly into the financial system

**"Layering"** - the proceeds are moved through a series of financial transactions, making it harder to establish their origin

**"Integration"** - the money launderer creates a legitimate explanation for the source of the funds allowing them to be retained, invested into the legitimate company, or to acquire assets



# Market abuse and insider dealing

## WHAT YOU SHOULD KNOW

“**Market abuse**” encompasses unlawful behaviour in the financial markets and, for the purposes of Market Abuse Regulation, it should be understood to consist of insider dealing, unlawful disclosure of inside information and market manipulation.

As one of our colleagues, you may have inside information about the securities of the Company and may be in a position to commit an offence or to be accused of committing an offence under insider dealing laws. To avoid this, whilst in possession of inside information, or as otherwise directed by the dealing code, you must not:

- Acquire or dispose of securities in Fintel plc (LON: FNTL).
- Assist or otherwise act as an intermediary between any parties acquiring or disposing of securities in Fintel plc.
- Encourage another person to acquire or dispose of securities in Fintel plc.
- Disclose inside information about our securities or business performance or plans or any other Confidential Information.
- Create securities in Fintel plc.

Seek guidance from the Chief Financial Officer if you have any doubts about how to apply our Insider dealing policy. The policy is available on our HR system, Cezanne.

# Conflicts of interest

## OUR STANCE:

We base our relationship with our people on mutual trust. We are committed to preserving the interests of our people and expect them to act in good faith towards Fintel’s fundamental interests. We are committed to resolving any conflicts we are aware of fairly.

Your obligations for managing conflicts of interest:

- Read, understand and comply with our conflicts of interest policy available on our HR system, Cezanne.
- Identify and disclose any perceived, potential or actual conflicts of interest as they arise.
- Always be transparent, open and honest when discussing conflicts of interest.

## WHAT YOU SHOULD KNOW

“**Conflict of interest**” may occur where your personal interest might contradict the interest of the Company, which may impair your judgement or ability to make unbiased and objective decisions.

**Q:** My sister represents a supplier we are looking to engage. Should I report this?

**A:** Yes. Even if the relationship is unlikely to adversely affect the business, in order to avoid perceived or actual conflict of interest you should declare the relationship in line with our conflicts of interest policy.

# Facilitation of tax evasion

## OUR STANCE:

We have a zero tolerance towards the criminal facilitation of tax evasion. We are committed to:

- Rejecting the facilitation of tax evasion, and
- Not recommending the services of others who do not have reasonable prevention procedures in place.

Involvement in the criminal facilitation of tax evasion exposes both the Company and the person facilitating the evasion to a criminal offence. It will also damage our reputation and the confidence of our customers, contractors, suppliers and business partners.

The Criminal Finances Act 2017 (CFA 2017) came into force in the UK on 30 September 2017. It introduced a corporate offence of failure to prevent the criminal facilitation of tax evasion.

This corporate offence can be committed regardless of whether the tax evaded is owed in the UK or in a foreign country. There is only one defence: when the tax evasion facilitation offence was committed, that the Company had reasonable prevention procedures in place.

Our prevention procedures are set out in our tax evasion facilitation prevention policy available on our HR system, Cezanne.

We expect all our staff, contractors, suppliers and other business partners to join us in our commitment not to facilitate tax evasion. Please read our tax evasion facilitation prevention policy, thoroughly and give it your support.

## WHAT YOU SHOULD KNOW

“**Tax evasion**” is the illegal non-payment or under-payment of taxes. It is usually perpetrated by not declaring or falsely declaring taxes due to the relevant tax authority. Tax evasion is a criminal offence. It can be committed by an individual, e.g.: in relation to income tax or VAT, or by a legal entity, e.g.: in relation to corporation tax.





# Supporting our people and interacting with others



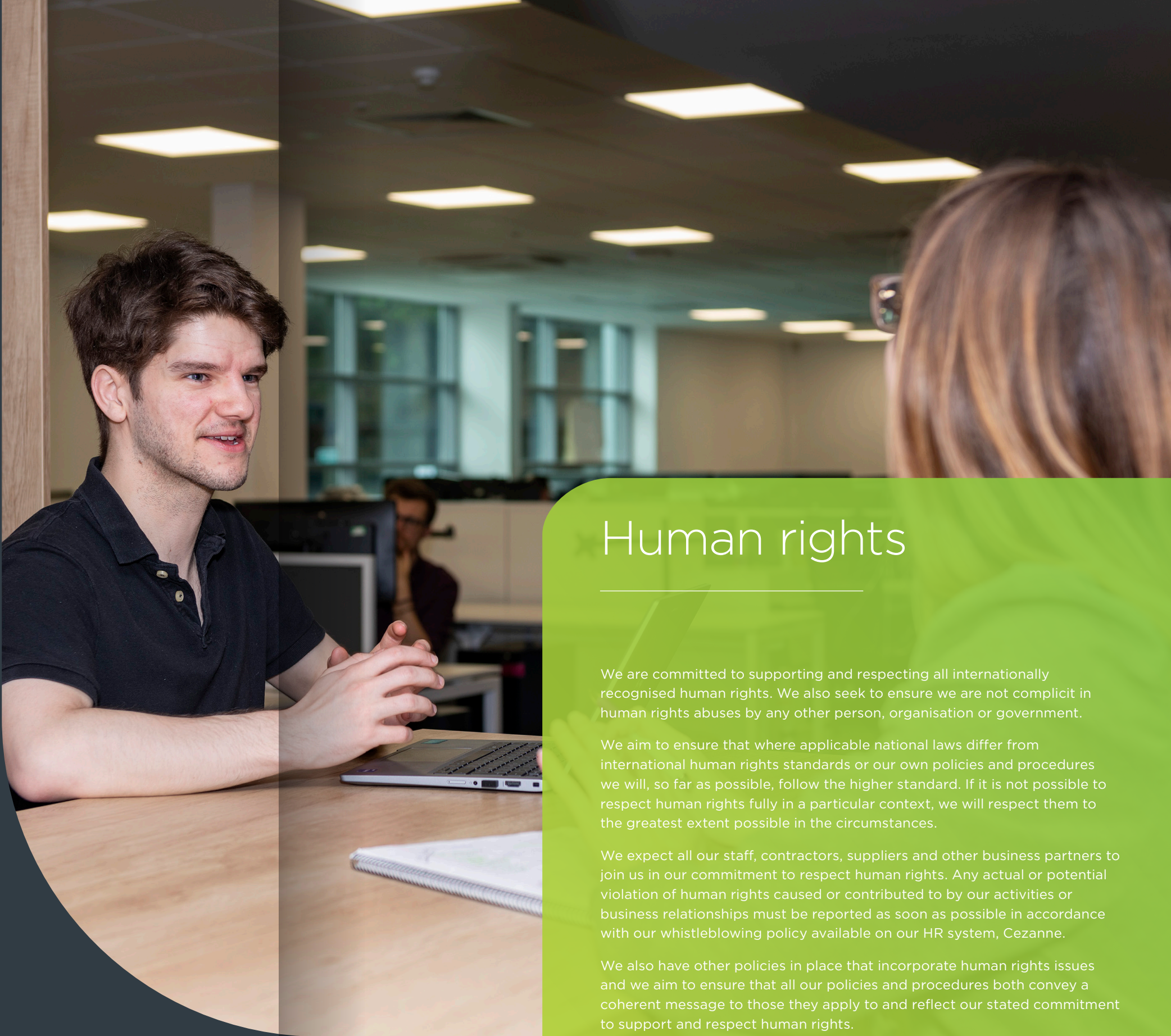
Be thoughtful and respectful when interacting with others, treating everyone fairly and with respect, dignity and decency.

Our people are our driving force, creating growth and fostering innovation and we succeed when they succeed. We're committed to building an engaging environment in which everyone can thrive by promoting diversity, individuality, learning and development. To ensure that Fintel continues to be a fair, inclusive, and rewarding place to work, where individuals can be themselves and feel empowered to succeed, we continuously develop our knowledge, our approach, our resources and policies.

## OUR STANCE:

We believe that ensuring a supportive and inclusive culture is key to our success as individuals and an organisation. We are committed to:

- Promoting a culture of diversity and inclusion, recognising that people from different backgrounds and experiences bring valuable contributions.
- Providing equal learning, internal mobility and progression opportunities to support the growth and development of our people.
- Recruiting, developing and promoting people for their aptitude, skills, experience and ability.
- Having zero tolerance for discrimination on grounds of protected characteristics, such as age, gender, ethnic background, race, nationality, faith or belief, sexual orientation, gender reassignment or disability.
- Creating a work environment free of harassment and bullying, where everyone is treated with dignity and respect.
- Protecting the health and safety of employees, customers, contractors and other visitors to our offices.



## Human rights

We are committed to supporting and respecting all internationally recognised human rights. We also seek to ensure we are not complicit in human rights abuses by any other person, organisation or government.

We aim to ensure that where applicable national laws differ from international human rights standards or our own policies and procedures we will, so far as possible, follow the higher standard. If it is not possible to respect human rights fully in a particular context, we will respect them to the greatest extent possible in the circumstances.

We expect all our staff, contractors, suppliers and other business partners to join us in our commitment to respect human rights. Any actual or potential violation of human rights caused or contributed to by our activities or business relationships must be reported as soon as possible in accordance with our whistleblowing policy available on our HR system, Cezanne.

We also have other policies in place that incorporate human rights issues and we aim to ensure that all our policies and procedures both convey a coherent message to those they apply to and reflect our stated commitment to support and respect human rights.





# Competition law and anti-trust



Do not permit or engage in actions that could be seen as anti-competitive.

## OUR STANCE:

We are strong but fair competitors. We compete vigorously, but also with integrity and in compliance with competition and antitrust laws. Those laws are designed to protect businesses and consumers from anti-competitive behaviour and to safeguard effective competition.

The following are examples of potentially illegal conduct:

- Competitors agreeing or taking joint actions regarding:
  - prices, terms or bids;
  - product or territory allocations or divisions;
  - selection of customers or suppliers; or
  - limits on production, inventory or research and development.
- Prohibiting suppliers and their customers or licensees generally to agree on the prices at which goods or services will be resold.

- Dominant companies taking actions that appear to be efforts to control a market, e.g.:
  - tying or requiring bundling of separate products;
  - unfairly terminating dealers, distributors or suppliers;
  - discriminating on price;
  - selling below cost (predatory pricing);
  - imposing overly restrictive exclusive dealing arrangements.
- Employing unfair or deceptive trade practices or methods of competition, e.g.:
  - misleading advertising;
  - disparaging a competitor's product;
  - harassing a competitor;
  - stealing trade secrets or other confidential business information.

There may be legitimate reasons and occasions for interacting with competitors, e.g.: trade association involvement, benchmarking, joint ventures, gathering competitive intelligence, and certain joint activities such as lobbying and legal enforcements. However, these interactions carry an inherent risk under competition law.

## We are committed to complying with competition law.

If you have any questions or concerns about competition law compliance, contact the legal department.

To comply with bribery laws, and this Code, you must:

- Read, understand and comply with this guidance.
- Report any concerns of non-compliance promptly using our reporting procedures.

## WHAT YOU SHOULD KNOW

Competition and antitrust laws prohibit 'restraints of trade', including certain types of agreements or conduct involving competitors, customers or suppliers, or even a single company with a dominant market position.



## WHAT IF WE GET IT WRONG?

Enforcement action can be taken against any business, regardless of size and geographic scope, and businesses found in breach can be subject to substantial fines or, in some cases, individuals sentenced to prison.

The European Commission (EC) and local authorities have authority to conduct surprise inspections (known as dawn raids) when they suspect competition law violations. The EC may enter our offices, or even your home, to examine and take copies of business records; seal our offices and records; interview employees; and take notes about facts or documents relating to the subject matter and purpose of the inspection.





# Data privacy



Protect the personal data we are trusted with by our suppliers, customers, colleagues and other stakeholders

## OUR STANCE:

We are committed to protecting the privacy and security of personal data relating to our employees, customers, consumers and business partners, and to complying with all laws that regulate how we handle such information. Failure to do so may impact our reputation and could result in severe civil penalties being imposed on the organisation and our staff.

In the course of our business, we may collect, hold and use personal data relating to our customers, suppliers, employees, applicants for employment, and shareholders.

We want to create an environment of confidence and trust that encourages people to share their personal data with us as appropriate for our business needs. This allows us to better understand their needs and thus provide them with high quality products and services.

## WHAT YOU SHOULD KNOW

**“Personal data”** is any information relating to an identified or identifiable individual. This includes a person’s name, postal address, email address and telephone number, whether personal or work-related. It also includes sensitive personal data such as information on an individual’s racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership (or non-membership), physical or mental health or condition, sexual life, genetic or biometric information.

To do this, you must:

- Comply with applicable laws and Company policy relating to protection and use of personal data.
- Not collect, process, use, disclose or store personal data unless you have a legitimate business purpose for doing so, and any necessary notices have been provided to the relevant individuals.
- Carefully follow Company policies, and other protections related to properly classifying, collecting, processing, using, disclosing, storing, transferring, and deleting personal information. More information can be found in our data protection policy available on our HR system, Cezanne.

## WHAT IF WE GET IT WRONG?

The UK General Data Protection Regulation (“GDPR”) is among the world’s toughest data protection laws. Under the GDPR, the Information Commissioner’s Office can impose fines of up to up to £17.5 million, or 4 percent of worldwide turnover for the preceding financial year - whichever is higher.

# Information security

All staff are collectively and individually responsible for information security. This involves knowing and following all relevant policies and procedures designed to safeguard the Company’s information.

All staff are expected to:

- Comply with applicable laws and Company policy relating to protection and use of personal data.
- Keep user IDs and passwords confidential and not share them with others or write them down.
- Ensure that computers and other electronic devices are kept physically safe and password protected, and that those passwords are changed on a regular basis.
- Be careful to avoid downloading or installing software from the Internet without it first being virus checked by the IT team.
- Lock their computer and other electronic devices when not in use.

- Read and follow Company’s communications and guidance for safeguarding information.
- Not load personal or unauthorised software on Company computers, mobile devices, tablets or other electronic equipment.
- Keep desk and work areas clear of sensitive information.
- Only send confidential or restricted information when authorised to do so and with appropriate safeguards in place to protect that information.

If your job involves access to personal information and/or sensitive personal information, ensure you know and comply with all applicable policies and laws for that information. In particular, please see our data protection policy available on our HR system, Cezanne.

If you have any questions or concerns about information security, contact Fintel’s Chief Operating Officer.





# Responsible use of Company assets

We are all responsible for protecting Company resources and assets. This includes money, property or other physical assets such as vehicles, mobile phones or laptops. Company property should be used responsibly, and reasonable steps taken to protect it from loss, damage or misuse.

You must ensure that all expenses incurred are legitimate and reasonable and expense claims are made accurately, honestly and in a timely fashion. Further information can be found in our expenses policy available on our HR system, Cezanne.

# Social media

Social media platforms and services are valuable tools to help us strengthen our brands, promote our offering, and build relationships with our customers and prospects. They allow us to promote communication, discussion and the sharing of information.

The term ‘social media’ is used within this Code to describe dynamic and socially interactive networked information and communication technologies by which personal information, opinions or other content can be presented for public consumption on the Internet.

This includes social networks or platforms, community sites, blogs, microblogging sites, wikis, web forums, social bookmarking services and user rating services. Examples include Facebook, LinkedIn, Yammer, YouTube, Instagram, Twitter, Tumblr and our intranet.

Social media is a form of communication, and you should treat it exactly as you would any other communication medium. Be responsible, diligent, and careful. If in doubt, don’t say it or write it.

When using social media, though, you must:

- Exercise personal integrity, professionalism and responsibility.
- Respect our intellectual property rights and those of third parties.
- Only represent or speak on behalf of the organisation if you have authority to do so.
- Not share confidential information or other protected information (e.g.: information relating to business performance or financials).

These precautions apply to the use of social media in a professional capacity. They also apply to your personal use when you:

- Identify yourself as an employee of the organisation.
- Post about our businesses, products, services or competitors.
- Discuss or connect with other employees or our customers, agents, suppliers or other partners.

An example scenario is provided below for illustrative purposes. Please refer to our social media policy, available on Cezanne, for further information.

**Q:** Jon likes to share information and opinions based on his work experiences on LinkedIn. A colleague told Jon that his actions were subject to the Company’s social media policy. Jon disagrees as he is doing it in his own time and on his personal account. Who is correct?

**A:** Jon’s colleague is correct. Jon is not prohibited from this activity, but is subject to the policy as he is likely identifiable as an employee of the company and may be perceived as speaking on its behalf. If he is posting about the company’s products, services, competitors or is connecting with work-related contacts, he is subject to the policy and needs to know and follow it and any other policies or guidance provided by his business.

# Risk management

Risk is part of everything we do. Managing risk improves the way we deliver our business and plays a key role in helping us achieve our strategic objectives and avoid unwelcome surprises. Good risk management should be an integral part of everyday business.

Risk is not easily defined, but generally it is the possibility of an adverse or unwelcome outcome. This could be a financial loss, but it could also be something less quantifiable, such as damage to our Company’s reputation.

Risk management is not about avoiding risk or being risk averse (it is often said that the reward for risk is profit), nor should it be performed simply as a tick box compliance activity.

We encourage innovation and the taking of considered risks as ways to improve our business. This involves:

- Creating a no-blame risk environment.
- Implementing a standard approach to risk management across the Company.

- Ensuring that key risks are visible, are owned by the right person and are actively addressed, e.g.: by recording this information in a risk register.
- Integrating risk management into our business processes including finances, procurement, human resources, strategy, key decision-making processes and major change initiatives.
- Ensuring all managers have a good understanding and awareness of risk management.
- Communicating clear messages so that everyone understands the role they must play in identifying and managing risks.
- Encouraging and supporting staff in identifying risks in their everyday business and proactively dealing with those risks.

If you require further guidance about risk management or you have identified a risk that you wish to report, please contact the Chief Financial Officer.

## Risk Management Framework

The diagram below illustrates examples of how we manage risk across the organisation. We continue to review and improve our processes and develop our risk capabilities, as required, as the Company develops

