

RISK MANAGEMENT POLICY

Phoenix Training's Risk Management Policy and Enterprise Risk Management framework are integral to the company's ability to deliver its strategic objectives and business plans by ensuring that:

- risk management is established within the culture across all levels of the organisation;
- a standard and consistent approach for the identification, assessment, response and monitoring of risk is in place;
- the company complies with those mandatory risk management requirements within the UK Corporate Governance Code including maintaining sound risk management and internal control systems and that emerging business critical risks are escalated in a timely manner;
- an ongoing activity to review the adequacy and effectiveness of the risk management process within the internal control environment is in place;

and

• the principles of enterprise risk management are integrated into the Business Management System;

The Phoenix Training's approach to Enterprise Risk Management is to identify and assess risk in order to inform decision making around responding to risk and opportunities, limiting any adverse impact of such events and pursuing opportunities where taking risks might benefit the business. In understanding and managing risk we provide greater certainty over results and build confidence throughout our shareholders, employees, customers, suppliers and the communities in which we operate.

It is the responsibility of:

- the Board to establish procedures to manage risk, oversee the internal control framework, and determine the nature and extent of the principal risks the company is willing to take in order to achieve its long-term strategic objectives;
- the Audit and Risk Committee to provide independent oversight of the effectiveness of risk management and associated internal control environment;
- the Executive Committee to own and provide effective management and reporting of assigned

Company risks;

- the members of the Executive Team (ET) to monitor changes in the company's risk profile and act as the executive oversight for risk management within their businesses and functions;
- each business and functional head to ensure that effective arrangements, and management controls, to deliver the requirements of this Policy are established and implemented across the operations of the business; and
- every individual in the business to comply with this Policy as an integral part of their day to day duties.

This Policy will be brought to the attention of our employees, supply chain partners and relevant interested parties and reviewed on an annual basis.

AUTHORISATION

Jill Flockhart - Managing Director, January 2023

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