



Risk Management Policy

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1. Context

Fatfish Internet Group Limited (Fatfish) is a leader in the internet investment sector. Our continued growth and success depends on our ability to understand and respond to the challenges of an uncertain and changing world. As a small, dispersed and complex organisation, this uncertainty generates risk, with the potential to be a source of both opportunities and threats. By understanding and managing risk, we provide greater certainty and confidence for all our stakeholders.

The risk inherent in our operating environment creates the need to think about, take and manage risk in an informed way. Explicit and effective risk management is a source of insight and competitive advantage. As such, forward-looking risk management must be a cornerstone of our decision-making. To this end, Fatfish is committed to the ongoing development of a strategic and consistent enterprise-wide approach to risk management, underpinned by a risk-aware culture.

Everyone in Fatfish has a role in managing risk by enhancing opportunities and minimising threats, so that together we achieve our common goals – growing our business sustainably, enhancing value for customers and shareholders, contributing to our communities and investing in the future of each country we operate in.

2. Scope

This is a group-wide policy and applies to all operations in all countries within which Fatfish operates. The policy is supported by the Risk Management Charter.



Fatfish Internet Group Limited (FATFISH:FFG)

3. Purpose

This policy is a statement of the overall approach to risk management for Fatfish. The overriding purpose of risk management is the responsible achievement of the company's objectives.

4. Principles

The effective management of risk is vital to the continued growth and success of Fatfish.

For risk management to be effective, all operations must apply the following principles to the context of their particular business and its objectives:

- Risk management must create and protect value
- Risk management is integrated into organisational processes
- Explicit risk management helps decision-makers make informed choices
- Risk management is focused on the sources of uncertainty around the achievement of objectives
- Risk management must be tailored to the context and fit for purpose
- Risk management is dynamic, iterative and responsive to change.

5. Responsibility

Responsibility for risk management is shared across the organisation.

Key responsibilities include:

- The Board is responsible for satisfying itself annually, or more frequently as required, that management has developed and implemented an effective risk management framework.

Detailed work on this task is delegated to the Audit and Risk Oversight Committees (AROC) and reviewed by the full Board. The Nomination Committee also assist the Board in this role.

- **The AROC 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.**
- **Senior Management is responsible for periodically reviewing the group's risk profile, fostering a risk-aware culture and reporting to the AROC on the effectiveness of the risk management framework and of the company's management of its material business risks.**
- **Senior Management is responsible for making recommendations for any changes in the risk management framework, ensuring that risk management activities are integrated, consistent and systematically managed on an enterprise wide basis, and receiving and reviewing risk management reports.**
- **Business Units are responsible for the effective identification, management, reporting and control of risk within their areas of responsibility, and for developing a risk aware culture**
- **Business Review (internal audit) provides independent assurance on the effectiveness of internal controls and the risk management framework.**

7. Review

This policy will be reviewed every two years or earlier if required by a change in circumstances.