

# RISK MANAGEMENT POLICY



Governs	Globally
Policy / Version number	20.01
Effective From	1 November 2025
Approval	Approved by the Board 30 October 2025

## 1. Purpose

This Risk Management Policy (“**Policy**”) sets out the approach of Mint Innovation Limited and its subsidiaries (together, “**Mint**”) to identifying, managing, and overseeing risk. Effective risk management is integral to our governance framework and business strategy, supporting informed decision-making and long-term value creation. This Policy ensures that Mint maintains a sound system of risk management and internal control, covering financial and non-financial risks, aligned with our regulatory obligations, global operations, and strategic objectives.

This Policy outlines the expectations of Mint for identifying, disclosing, and managing actual, potential, or perceived conflicts of interest. It supports a culture of transparency and integrity and ensures that personal interests do not improperly influence professional judgment or company decisions. Effective risk management enables Mint to execute its strategic priorities with agility, while ensuring resilience against threats and compliance with regulatory obligations.

1. Purpose .....	1
2. Objective of Risk Management .....	1
3. Risk Review .....	2
4. Identified Risks .....	2
5. Global Compliance .....	2

## 2. Objective of Risk Management

Risk management is a complex and critical component of Mint’s governance. The Board will oversee and guide the detail of risk management. The Chief Executive Officer is charged with implementing appropriate risk management systems within Mint. Aspects of this process may be delegated. Risk management is considered a key governance and management process. It is not an exercise merely to ensure regulatory compliance. Therefore, the primary objectives of the risk management system at Mint are to ensure:

- all major sources of potential opportunity for and harm to Mint (both existing and potential) are identified, analysed and treated appropriately;
- business decisions throughout Mint appropriately balance the risk and reward trade off;
- regulatory compliance and integrity in reporting are achieved; and
- ensuring robust and effective risk management (for both financial and non-financial risks), compliance, continuous disclosure and control systems (including legal compliance) are in place and operating effectively; and
- senior management, the Board and investors understand the risk profile of Mint.

In line with these objectives, Mint’s risk management system covers:

- operations risk;
- financial reporting; and
- compliance,

and will be based on Standard ISO 31000:2018.

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### **3. Risk Review**

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The Board reviews all major strategies and transactions and corporate actions for their impact on the risk facing Mint and makes appropriate recommendations. Mint also undertakes an annual review of operations to update its risk profile. This normally occurs in conjunction with the strategic planning process. Mint discloses in each reporting period that such a review has taken place. The Board undertakes a quarterly review of those areas of risk identified.

In addition, as specified by Recommendation 4.2 of the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations, the Chief Executive Officer and Chief Financial Officer (as applicable) will conduct a review and provide a written declaration of assurance that, in their opinion, the financial records of Mint for any financial period have been properly maintained, comply with the appropriate accounting standards and give a true and fair view of the financial position and performance of Mint and have been formed on the basis of a sound system of risk management and internal control which is operating effectively.

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### **4. Identified Risks**

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The Board has identified a range of specific risks that have the potential to have an adverse impact on its business.

These include:

- operational risk;
- health and safety risk;
- environmental risks;
- intellectual property risk;
- technology risk;
- supply chain risk;
- innovation risk;
- insurance risk;
- litigation risks;
- financial risk;
- privacy and data risks;
- conduct risks;
- digital disruption risks;
- cyber-security risks;
- sustainability risks;
- key-man risks;
- treasury and finance risks; and
- compliance risk.

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### **5. Global Compliance**

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Mint's risk management systems are designed to meet the expectations of relevant corporate governance and risk legislation across jurisdictions in which Mint operates, including the NZ Companies Act 1993, the Corporations Act 2001 (Australia), the UK Companies Act 2006, and applicable US regulatory requirements such as the Sarbanes-Oxley Act (SOX).

Mint will continue to monitor evolving regulatory risk frameworks, including SEC and FCA expectations regarding enterprise risk and cyber oversight.