

Monvia Limited

ACN 685 591 280

Risk Management Policy

Adopted: 4 June 2026

1. Introduction

Monvia Limited (**Company**) recognises that risk management is an integral part of the Company's business operations and is a continuous process demanding awareness and proactive measures to reduce the occurrence and impact of risk events.

2. Objectives

The objectives of this Policy are to:

- provide a framework for identifying, assessing, monitoring and managing risk;
- communicate the roles and accountabilities of participants in the risk management system; and
- highlight the status of risks the Company faces, including any material changes to the Company's risk profile.

3. Risk Management Framework

- The Company maintains an enterprise-wide risk management framework that provides for the ongoing identification, assessment, management and monitoring of strategic, operational, financial and compliance risks.
- Risk management is embedded into the Company's day-to-day operations and decision-making processes and is not limited to discrete transactions or proposals.

4. Role and responsibilities

The Board of Directors (**Board**) of the Company is responsible for:

- determining the Company's risk profile and risk appetite;
- the establishment and implementation of the risk management system, including risk management procedures and policies, internal compliance and internal controls;
- ongoing consideration of whether the Company's risk management system is sound, operations are within the risk appetite set by the Board and the risk management framework adequately deals with emerging risks, with risk management being a selective agenda item at certain scheduled Board meetings; and
- reviewing the effectiveness of the Company's risk management system at least annually.

Management is responsible for implementing the Company's risk management framework, embedding risk management into day-to-day operations and decision-making, and maintaining appropriate processes, controls and reporting to support the framework.

The Chief Executive Officer is accountable to the Board for the effective implementation of the framework.

Senior executives and business leaders are responsible for identifying, assessing, managing and reporting risks within their areas of responsibility and for maintaining appropriate controls.

The Board has established the Audit and Risk Management Committee to assist with discharge of its obligations in relation to risk management in accordance with the Audit and Risk Management Committee Charter.

The Board will approve the Company's risk appetite from time to time and management will use that risk appetite to support decision-making, prioritisation and escalation. Any material breach, or likely breach, of the Company's risk appetite must be reported promptly to the Audit and Risk Management Committee and the Board, together with proposed management actions.

5. Risk management and internal controls

Risk management and internal controls include the following key elements:

- Oversight of the Company's financial affairs remains the responsibility of the Board, supported by management reporting, delegated authorities and approval controls.
- Material expenditure, investments and commitments must be approved in accordance with the Company's delegated authority framework and any Board approval requirements.
- Appropriate due diligence must be undertaken in relation to material business relationships, acquisitions, outsourcing arrangements, strategic partnerships and significant technology or supplier decisions.
- The Company will maintain controls to protect its intellectual property, confidential information and commercially sensitive information.
- The Company will maintain appropriate information security, cyber security, privacy and data governance controls, including access management, incident detection and response, system resilience, backup and recovery processes, and periodic control review.
- The Company will maintain appropriate business continuity and disaster recovery arrangements to support continuity of critical operations and services.
- The Company will monitor and manage legal, regulatory, workplace health and safety, and employment-related risks relevant to its operations.
- The Company will maintain appropriate governance and oversight over the use of artificial intelligence, automated tools and other emerging technologies where relevant to its products, services or internal operations.

6. Risk analysis and evaluation

6.1 Risk evaluation

The Company maintains a structured process for identifying, analysing and evaluating risks across the business, which is applied on an ongoing basis.

A risk evaluation will be carried out by senior management and communicated to the Board before approval of a material proposal. Proposals regarded as significant may include:

- major fundraising activities or capital management initiatives;
- material customer implementations or major delivery commitments;
- significant new business relationships, strategic partnerships or outsourcing arrangements;
- new or materially enhanced product or service offerings;
- acquisitions, disposals or other corporate transactions;
- major technology transformation initiatives or material changes to critical systems;
- the use of artificial intelligence or automated decision-support capabilities in products or operations where material risk may arise;
- entry into a new country or market;
- material cloud, hosting or other third-party supplier arrangements;
- registration, acquisition or enforcement of material intellectual property rights; and
- major capital procurement or other material contractual commitments.

6.2 Risk management plan

The risk evaluation will be documented in a manner that:

- identifies and describes the internal and external risks;
- assesses the likelihood and potential impact of those risks;
- identifies existing controls and any control gaps;
- records risk ownership and required treatment actions; and
- includes any necessary risk management plan.

A risk management plan will identify each material risk, assign a risk owner, specify the relevant tolerance or thresholds, identify required controls and treatment actions and specify action to be taken in the event that a threshold is exceeded or a material risk event occurs.

7. Risk monitoring and review

If after consideration of the risk analysis a proposal is approved by the Board, senior management will monitor progress against the risk management plan and promptly report any material matters to the Board.

Monitoring the status of each risk and any necessary action plan relating to treatment of risk will take place on a regular basis. Any action or recommendations arising out of the review process will be implemented by management.

The Board will review assessments of the effectiveness of risk management and internal compliance and control on an annual basis.

The Company maintains a risk register which is reviewed and updated on a regular basis by management.

A summary of key risks and any material changes to the Company's risk profile is reported to the Audit and Risk Committee and the Board at least quarterly.

Each material risk is assigned an owner responsible for monitoring and managing that risk.

Management will promptly escalate to the Chief Executive Officer, the Audit and Risk Management Committee and the Board any material incident, control failure, emerging risk or change in risk profile that may have a significant impact on the Company.

8. Insurance

The Company will maintain a comprehensive suite of insurance policies, including the following:

- general liability insurance;
- IT liability insurance;
- cyber insurance;
- workers' compensation insurance; and
- directors' and officers' insurance.

The Company's insurance policies will be reviewed on at least an annual basis.

9. Questions and further information

If you have any questions or need further information about this Policy, please contact the Company Secretary.

10. Corporate Group

In this document, a reference to the Company includes any 'related body corporate' (as defined in the Corporations Act) of the Company, as the context requires.

11. Review and publication of this Policy

The Board will review this Policy on a periodic basis, and may amend this Policy, to ensure that it is appropriate for the Company's stage of development and nature of its operations.

The Company will make this Policy available in the manner determined by the Board from time to time, including publication on the Company's website at www.monvia.io, where appropriate or required.