



RISK MANAGEMENT POLICY

NWH Group Limited
Reviewed- January 2026

Definition of 'risk'

Introduction

We define risk as the threat to achieving our strategy, policy, and operational goals posed by external and internal events.

1. Aim of risk management

We aim to manage risk better, but do not expect to eliminate it.

2. Commitment to 'integration'

We will manage risk throughout our management activities and operations and provide training and education to help people do this effectively.

3. Position relative to internal control

Our internal control framework includes our risk management approach.

4. Compliance with guidance

Our approach will meet requirements externally imposed and also be improved with good practice from other sources.

5. Outline of method

In developing our Business Plan, Divisional Plans, and programme/project plans we will explicitly consider uncertainty as to the results of alternative plans under consideration and refine our plans in response to that uncertainty.

The effort to manage uncertainty as to outcomes for strategy, reputation, operations, and finances will be directed by the Board.

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This approach will also be applied to monitoring progress and to the design of our system, processes, premises, and other elements of our organization.

6. Roles

Roles and responsibilities:

Each management level is responsible for being risk aware and managing risk.

The main roles are these:

- The Board will confirm that achieving policy aims will be helped by the risk management approach.
- The Board Audit Committee will review the risk management approach annually and progress of risk management actions every 4 months.
- The Compliance Director will ensure that the risk management approach is sufficient and that those features of management that help to manage risk work effectively.
- Members of the Executive Team will manage in ways that manage risk effectively in their areas of responsibility and will promote the same behaviours to their subordinates.
- The Risk Group includes the CEO, Heads of Compliance, Finance Director and external Non executives. The Group will provide advice and risk training for managers.
- Managers at all levels will manage in ways that manage risk effectively.
- Internal Audit will independently review the overall internal control framework, including risk management, and report findings to the Board Audit Committee.

Signed:

Date: 15/01/2025

Gavin Money

Managing Director

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