

# Risk Management Policy

PHX029

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# 1. Document Control

## 1.1 Purpose of this Policy

To document and standardise the approach to risk management.

## 1.2 Scope

Applicable to all business, information, cyber and technical security processes within Phoenix and should be used as the overarching policy and procedure for risk management processes and risk acceptance criteria.

# 2. Policy Statement

## 2.1 Risk Management

Phoenix identifies, assesses, and mitigates risks where appropriate in relation to financial, strategic, operational, and technical risks, including monitoring and tracking risk mitigations and controls to ensure appropriate and proportionate to the identified risk throughout changing threat landscapes. The ERM Framework is governed by the Bytes Technology Board.

Risks are identified through day-to-day business activities; planning; monitoring; committee discussions and through the incidents and events. Identified risks must be escalated to the Senior Management Team or the Governance Manager for appropriate assessment.

Having regard for risk is the responsibility of all employees in course of carrying out their duties. The Senior Management Team have the accountability of managing risk within their work areas as subject matter experts.

It is the responsibility of the Governance team to ensure risk is appropriately assessed, reviewed, monitored, and managed through the risk and internal audit functions.

## 2.2 Risk Assessment

Risk Assessments identify the risks applicable to the company; probability these may occur; the impact of a realized risk and any mitigation action required to manage the risk. Risks are assessed by way of 5 x 5 risk analysis with assigned owners.

|        |              |   | LIKELIHOOD      |                       |                       |                       |                                  |
|--------|--------------|---|-----------------|-----------------------|-----------------------|-----------------------|----------------------------------|
|        |              |   | Remote<br>< 10% | Unlikely<br>10% - 25% | Possible<br>25% - 50% | Probable<br>50% - 75% | Confidently<br>Expected<br>> 75% |
|        |              |   | 1               | 2                     | 3                     | 4                     | 5                                |
| IMPACT | Catastrophic | 5 | Low             | Medium                | High                  | Very High             | Catastrophic                     |
|        | Severe       | 4 | Low             | Medium                | High                  | Very High             | Very High                        |
|        | Material     | 3 | Low             | Medium                | Medium                | High                  | High                             |
|        | Moderate     | 2 | Low             | Low                   | Medium                | Medium                | Medium                           |
|        | Minor        | 1 | Low             | Low                   | Low                   | Low                   | Low                              |

The impact measurement of risk is determined by considerations such health and safety; legal obligations; cyber risk; business continuity risk; supplier and subcontractor risk; and the financial impact as a percentage of Annual Operating Profit.

An escalation route appropriate to risk scoring is in place to ensure proportionate response from the Senior Management Team to the Bytes Technology Board

The full Phoenix Risk Management Framework is set out in PHX021 Enterprise Risk Management Framework.

## Version Control

| <u>Author</u> | <u>Version</u> | <u>Date</u>    | <u>Description</u>  |
|---------------|----------------|----------------|---|
| ISC           | 1.0            | July 2015      | Original Document   |
| ISC           | 2.0            | September 2018 | Amended following annual review   |
| ISC           | 3.0            | November 2019  | Amended following annual review   |
| ISC           | 4.0            | April 2020     | Inclusion of ISO 14001 and ISO 20000 requirements                           |
| ISC           | 4.0            | May 2021       | Annual review – no changes  |
| ISC           | 5.0            | June 2021      | Update to reflect holistic business approach to Risk. Alignment with Bytes. |
| ISC           | 6.0            | 01/02/2023     | Update to align with ERM Framework  |

## Document Approval

| <u>Name</u>    | <u>Version</u> | <u>Date</u>    | <u>Position</u>                |
|----------------|----------------|----------------|--------------------------------|
| Sam Mudd       | 1.0            | July 2015      | Managing Director              |
| ISC            | 2.0            | September 2018 | Information Security Committee |
| ISC            | 3.0            | November 2019  | Information Security Committee |
| ISC            | 4.0            | April 2020     | Information Security Committee |
| ISC            | 5.0            | June 2021      | Information Security Committee |
| Clare Metcalfe | 6.0            | February 2023  | Operations Director            |

Signed: *Clare Metcalfe* Clare Metcalfe, Operations Director

Dated: 01/02/2023