

## Risk Management Policy

This Risk Management Policy (“**Policy**”) applies to Fleetwood Limited and each of its subsidiaries (**Fleetwood**).

### 1. Overview

This Policy sets out Fleetwood’s approach to managing risk. It is designed to guide and support all staff in understanding and applying consistent risk management principles and practices across the organisation.

### 2. Scope

This Policy applies to all Fleetwood Employees.

This Policy also applies to consultants and advisers of Fleetwood and its subsidiary companies to the maximum extent possible.

For the purpose of this Policy, “**Fleetwood Employees**” means:

- a) the Board of Fleetwood and each Director; and
- b) all employees of Fleetwood, whether permanent, part-time, casual, full-time or ongoing, trainees or apprentices, and all contractors acting on behalf of Fleetwood.

Queries regarding implementation or interpretation should be directed to line managers or the Policy owner.

The most current version of this Policy will be located on the Fleetwood website at [www.fleetwood.com.au/about/corporate-governance](http://www.fleetwood.com.au/about/corporate-governance).

### 3. Risk Management approach

Fleetwood adopts an enterprise-wide approach to risk management that incorporates culture, conduct, compliance, processes and systems. This approach is aligned with the principles and guidelines of AS/NZS ISO 31000:2018.

Effective risk management is fundamental to good governance and enables us to:

- **empower our people to make informed decisions** within Fleetwood’s risk appetite that both protect the value of our assets and support the achievement of our strategic objectives
- develop a culture where everyone takes responsibility for risk, and
- **enhance performance and organisational resilience**, ensuring the organisation can adapt and respond in a dynamic environment

**We recognise that risk can present both a threat and an opportunity.**

**We are committed to embedding risk awareness and risk management capability into our core business processes**, making it an integral part of how we operate.

Fleetwood adopts a **Three Lines Model**, which ensures that:

- those closest to the activity are equipped and accountable for managing associated risks.
- oversight functions provide guidance, challenge, and support.
- independent assurance is provided through internal and external audit mechanisms.

#### 4. Roles and responsibilities

Role	Responsibility
Board	The Board is responsible for setting the risk management policy and risk appetite to ensure activities are consistent with the organisation's strategy and values.
Risk Committee	The Risk Committee supports the Board to oversee Fleetwood's risk management framework and support a prudent and risk aware approach to business decisions across Fleetwood.
Executive Committee	The Executive Committee is responsible for appropriately managing key risks and for the ongoing maintenance of the control environment. Each member of the Executive Committee is accountable for developing and promoting the framework and a culture of risk management within their business area.
All employees	All employees are expected to be risk advocates. Employees must comply with all regulatory and company policy requirements including reporting any identified risks to the appropriate management in a timely manner.
General Counsel & Company Secretary	Responsible to design, implement and report on the adequacy of this policy and Fleetwood's enterprise risk management framework. Responsible to ensure Fleetwood has appropriately qualified risk expertise to lead risk at Fleetwood.

#### 5. Related policies and procedures

This Policy is to be read in conjunction with Fleetwood's policies, procedures and charters including those as set out below:

Document name	Description
Risk Committee Charter	Outlines the role of the Risk Committee to oversee Fleetwood's risk management framework and support a prudent and risk aware approach to business decisions across Fleetwood, on behalf of the Board.
Speak Up Policy	Outlines Fleetwood's intention to facilitate a culture of speaking up and encourages disclosures of wrongdoing, including whistleblower protections.
Fraud, Bribery and Corruption Prevention Policy.	Outlines what is expected of Fleetwood employees and representatives in connection with preventing fraud, bribery and corruption.
Enterprise Risk Management Framework	Outlines the procedures and guidelines for implementing the principles outlined in this Policy.
Code of Conduct	Sets out the standard of conduct and behaviour that we expect and require of our people.

##### 5.1. Review

This Policy has been adopted by the Board on 29 January 2026.

This Policy will be reviewed and approved by Fleetwood's Board at least once every three (3) years or more frequently as required to ensure that it meets best practice standards and the needs of Fleetwood.