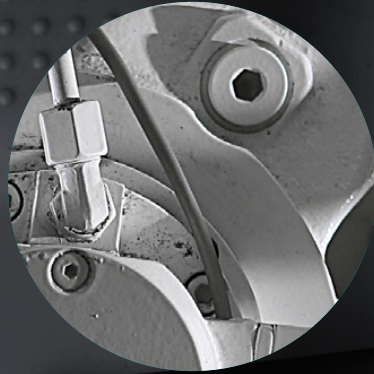


RISK MANAGEMENT POLICY



Pact Group Holdings Ltd
ACN 145 989 644

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RISK MANAGEMENT POLICY

1 PURPOSE

The purpose of this Policy is to provide direction for managing business risks in Pact Group.

2 SCOPE

This Policy applies to all employees of Pact Group.

3 POLICY STATEMENT

Pact recognises that risk is an inherent part of business and that it presents both opportunities and threats to our success. Effective risk management improves performance, encourages innovation and supports achievement of objectives.

We promote a risk-aware culture in decision making and are committed to manage all risks that may materially impact the business in a proactive and effective manner. This requires identification and mitigation of risks in a way that protects the businesses continuity and reputation, informs management decisions and drives competitive advantage.

We encourage reporting of newly identified risks that may impact our operations across all areas of enterprise risk including, but not limited to, operational, environmental, sustainability, compliance, strategic, ethical conduct, reputation or brand, technological product or service quality, human capital, financial reporting and market related risks.

Our Risk Management Framework sets out the principles and approach for risk analysis including identifying, assessing, responding to and monitoring risks. This Framework is based on **AS ISO 31000: 2018 Risk Management – Guidelines** and the requirements of **ASX Corporate Governance Council's Corporate Governance Principles and Recommendations**.

4 RESPONSIBILITIES

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All employees are responsible for working within the stated tolerance of risk which is reflected in the Company's Policies and for reporting any identified control failures to their appropriate business Manager. Incidents that may indicate systematic fraud or failure must be reported as soon as practicable to the Internal Auditor, Chief Financial Officer or Chief Legal Officer.

The Internal Auditor is responsible for performance of internal audits and reviews of processes to assess adequacy and effectiveness of controls in the business.

The Audit, Business Risk and Compliance Committee (Committee) is responsible for monitoring and reviewing adequacy of the Risk Management Policy and Framework.

5 REVIEW OF POLICY

The Committee is responsible for annual review and update of this Policy along with the Risk Management Framework.

VERSION CONTROL PAGE

Document number	PACT RSK POL 001 – 01
Controlled copy	Pact Group Intranet
Owned by	Chief Financial Officer
Approved by	Audit, Business Risk and Compliance Committee
Version	2
Approval date	22 May 2019
Next revision date:	2020

Detail Of Document Change	Version No	Issue Date
Document created	1.0	20 May 2014
Reviewed and re-issued	1.1	20 May 2015
Reviewed and re-issued	1.2	25 May 2016
Reviewed and re-issued	1.3	24 May 2017
Reviewed and updated	2	22 May 2019