

Business Risk Management Policy

1. Introduction

Abacus Group is committed to establishing a sound system of risk oversight and management and internal control to identify, assess, monitor and manage material risks related to the conduct of Abacus Group's activities. Abacus Group has adopted a structured and disciplined approach to risk management. It has implemented a risk management program in accordance with the ISO 31000:2018.

2. Purpose

This policy outlines Abacus Group's risk management principles and key responsibilities to effectively implement risk management throughout the organisation. The implementation of this policy is set out in the Risk Management Framework.

3. Scope

This policy applies to all directors and employees including contractors of Abacus Group and third parties engaged to act on Abacus Group's behalf.

Abacus Group (ASX:ABG) means the stapled group incorporating Abacus Trust, Abacus Income Trust, Abacus Group Holdings Limited, Abacus Group Projects Limited, together with its controlled entities and related bodies corporate (as defined under the Corporations Act 2001).

Any reference to the Board and its Committees means the Abacus Group Board and Abacus Group Board Committees.

4. Core Principles of our Risk Management Framework

Our risk management is built on a foundation that includes:

- the Board and senior management can confidently make informed business decisions based on risk assessment; • compliance with relevant legislation and regulations;
- a suite of policies and procedures which are supplemented by supportive systems and processes;
- delegation of responsibilities throughout Abacus Group and accountability for outcomes;

- control processes including management reporting and Board oversight; and
- a strong operational culture that seeks to anticipate and mitigate risks before they occur, and that reflects on the lessons learned as and when issues arise.

5. Responsibility

Abacus Group maintains a system of risk oversight, risk management and internal control over material business risks. Responsibility for risk management is shared across Abacus Group at every level.

5.1 Board

The Board is responsible for approving the Risk Management Framework and determining the overarching Risk Appetite for Abacus Group. The Board is responsible for:

- Promoting a proactive risk and compliance culture;
- Determining and approving the key policies and procedures governing the operations of Abacus Group, including approving the Risk Management Framework and ensuring that adequate risk management procedures exist and are being adhered to; and
- Defining the risk appetite, which determines the overarching risk appetite for Abacus Group.

5.2 Audit and Risk Committee

The Audit and Risk Committee's delegated Board responsibilities in respect of risk management include:

- Assisting the Board through periodic monitoring of the operation of the Risk Management Framework;
- Maintaining a risk management overview and monitoring role for compliance with this Framework; Overseeing a sound system of internal controls based on a risk-based approach for the identification, assessment, monitoring and management of risks that are deemed material to the fulfilment of Abacus Group's strategy;
- Reviewing this Framework and endorsing through the Board;
- Regularly reviewing the risk profile of Abacus Group; and
- Receiving risk management reports and making recommendations to the Board regarding any material management issues to be addressed or reviewed.

5.3 Risk and Compliance Team (including Chief Investment Officer and Risk and Compliance Manager)

The Risk and Compliance Manager and team are responsible for:

- Monitoring progress and for assisting other managers in reporting relevant risk information across Abacus Group;



- Ensuring Abacus Group’s risk register remains current, accurate, and complete;
- Ensuring that controls, and treatment plans if required, are carried out efficiently and effectively;
- Reviewing the overall effectiveness of this Risk Management Framework at least on an annual basis;
- Preparing quarterly Risk and Compliance Reports for the ARC; and
- Supporting and delivering risk and compliance training and awareness programs.

5.4 Employees

Abacus Group is committed to a strong risk management culture and all employees are responsible for managing risks within their areas of responsibility and ensuring they comply with all legislative, regulatory and company policy requirements. This includes reporting any identified risks to an appropriate level of management in a timely manner.

For risk management to be effective, first line roles (which include the Executive Management Team and Investment Committee) must assume primary responsibility and have accountability for managing risk within their respective areas.

6. Document Control

Effective: 01 July 2026

ABG Board approved: 18 June 2026

