



UK

## EM Normandie UK Limited

### Risk Management Policy

#### 1. Introduction

##### 1.1. Purpose

The purpose of the risk management policy is to explain the company's underlying approach to risk management and to document the roles and responsibilities of the Board of Directors, and the senior management team. It outlines key aspects of the risk management process and identifies the main reporting procedures.

Risk management informs strategic development through the identification and treatment of risk so that strategic objectives are more likely to be achieved, damaging events are avoided or minimised and opportunities are maximised. Good risk management increases the probability of success and reduces the probability of failure and uncertainty of achieving the company's objectives.

##### 1.2 Scope

This risk management policy forms part of the Company's governance and internal control arrangement. The Board of Directors has ultimate responsibility for risk management and is therefore responsible for the approval and review of the Risk Management Policy and for ensuring that it is appropriately managed.

##### 1.3 Definitions

A frequently used definition of risk is:

*'the threat or possibility that an action or event will adversely or beneficially affect an organisation's ability to achieve its strategic objectives'*

At an institutional level, risks can affect either positively or negatively the company's ability to operate as a business and/or deliver its strategic objectives. Risk management is important to ensure that threats and opportunities affecting the successful delivery of operating and commercial plans are appropriately addressed and managed.

#### 2. POLICY

##### 2.1 Risk Identification and Assessment

Risks are identified and assessed through the establishment of a Risk Register. For the Risk Register, the company uses a 5 x 5 risk rating mechanism to assess the impact (rated A to E) and likelihood of risk (rated 1 to 5), with a scoring of A1 denoting the highest risk on the scale as high impact and high likelihood.

Likelihood

I M P A C T	LIKELIHOOD				
	A5	A4	A3	A2	A1
	B5	B4	B3	B2	B1
	C5	C4	C3	C2	C1
	D5	D4	D3	D2	D1

Impact

The score should reflect the higher of the financial value, the proportion of teaching programmes affected and the degree to which the whole company is affected

**Score A (highest)**

- The incident would significantly affect the operation, reputation or strategic direction of the company, or
- The incident would cost the company £500,000. For instance, this could equate to a loss of £600,000 in a single year or losses of £150,000 per year over a period of four years.

**Score B**

- The incident would affect the operations, reputation or strategic direction of the whole Company but not significantly, or
- The incident would cost the company between £250,000 and £500,000. For example, this could be £300,000 - £600,000 in a single year or £75,000 - £200,000 per year over a period of four years.

**Score C**

- The incident would affect the whole company to a small extent, or
- The incident would cost the company between £150,000 - £300,000. For example, this could equate to a loss of £150,000 - £300,000 in one single year or losses of £37,500 to £75,000 per year over a period of four years.

**Score D**

- The incident would have little or no effect on the company, or
- The incident would cost the company up to £150,000. For example, this could equate to a loss of £150,000 in one single year or losses of up to £37,500 per year over a period of four years.



UK

### Likelihood

#### **Score 1 (highest)**

- It is expected that this risk will materialise at least once within the next two years or has already materialised. A risk of this kind is likely to be reflected as a contingency or directly in the company's budgets and medium-term financial plan.

#### **Score 2**

- It is reasonable to assume that this risk will materialise at some point (possibly once or twice within the next five years). This kind of risk may be reflected as a contingency in the company's budget.

#### **Score 3**

- It is reasonable to assume that the risk will materialise once or twice within a period of five to ten years.

#### **Score 4**

- There is a low likelihood of the risk materialising (there is a possibility that this could happen at least once within a period of five to ten years, but it is considered unlikely).

#### **Score 5**

- There is a very low likelihood of the risk materialising (this is not expected to happen but it may do in exceptional or unusual circumstances - it has been known to happen in the past)

### **3. Risk Reporting**

- Risks are recorded on the Risk Register

The criteria of the Risk Register are as follows:

CRITERIA	DETAIL
Risk Area	Identifies the areas of risk
Risk Description	A summary risk description
Contributing Factors	Key factors that would contribute to the risk, including sub-risks
Risk Ownership	Assigns ownership of the risk to relevant members of the Senior Management Team
Current Controls (Mitigating Factors)	Describes controls and management actions already in place to mitigate against the risk
Directions of Travel	An indication of whether the risk is seen as stable, increasing or decreasing
Planned actions/Contingency plans	Describes planned actions or controls that are in the process of being implemented, and notes any contingency plans in place or planned that should prevent the risk from materialising



UK

#### **4. Roles and Responsibilities**

The Board of Directors has the responsibility for effective risk management for all academic and operational aspects of EM Normandie UK Limited.

The Principal's role is to

- identify and evaluate any significant risks faced by the company
- inform the Board of Directors of such risks and collaborate with the Board of Directors to mitigate such risks
- create and implement policies on risk management
- design and implement processes and procedures to minimise risks, such as robust processes for the compliance with Health and Safety legislation, governments or other authorities' guidance on specific issues
- provide adequate information in a timely manner to the Board of Directors
- review entries on the company's Risk Register annually the Board of Directors

#### **4. Review**

This policy will be reviewed at least once a year



UK

## Annex 1 - control table

Version	v1	Name	Role	Date
Created by :		Birgit Muller	Office Manager	Nov 2020
Approved by :		Miriam Schmidkonz, Principal		
Version	v2	Name	Role	Date
Amended by :		Birgit Muller	Office Manager	Feb 2023
Changes approved by :		Miriam Schmidkonz, Principal		
Version	v3	Name	Role	Date
Amended by :		Birgit Muller	Office Manager	Aug 2024
Changes approved by :		Miriam Schmidkonz, Principal		
Version	v4	Name	Role	Date
Amended by :		Birgit Muller	Office Manager	Aug 2025
Changes approved by :		Miriam Schmidkonz, Principal		
Version				
Amended by :				
Changes approved by :				