MARLIN GLOBAL LIMITED

RISK MANAGEMENT POLICY

February 2026

THE OBJECTIVES OF RISK MANAGEMENT

Risk management is the systematic process of managing an organisation's risk exposures to achieve its objectives in a manner consistent with good governance, human safety, environmental factors, and the relevant legislation. It consists of the planning, organising, leading, coordinating, and controlling activities that minimise the adverse impact of risk on the organisation's resources, earnings, and cash flows.

The Marlin Global Risk Management Policy will be incorporated within the normal management and governance processes and will focus on the following:

- Effective and efficient continuity of operations;
- Safeguarding of shareholders' investments and the Company's assets;
- Maintenance of a positive reputation;
- Accuracy and reliability of internal and external reporting; and
- Compliance with applicable laws and regulations.

WHOSE RESPONSIBILITY IS RISK MANAGEMENT?

The ultimate responsibility for risk management rests with the Board.

The Board, in conjunction with the Corporate Manager, implements and operates risk identification measures, risk mitigation plans and key controls.

In fulfilling their responsibilities, consistent with the Management Agreement, the Chief Executive Officer or Chief Financial Officer of Fisher Funds Management Limited ("Fisher Funds or the Manager") and the Corporate Manager should identify and evaluate the risks faced by the Company for consideration by the Board and design, operate and monitor a suitable system of risk management, as approved by the Board.

Everyone involved with the business must take personal responsibility for managing risk to the business in their area of influence and take positive action when risk is identified.

RISK MANAGEMENT TOOLS

The risk management tools used by Marlin Global include:

1. Strong corporate governance;
2. Audit and Risk Committee;
3. Outsourcing of certain functions to experts;
4. Internal controls, procedures and processes;
5. Reporting systems to monitor risk;
6. Business continuity planning;
7. Insurance; and
8. Acceptance of the risk.

Some risks will be identified, assessed and accepted as risks without any active mitigation of the risk. This is the most appropriate strategy where the net cost of mitigating the risk is greater than the risk of loss. Acceptance of any risk must be a conscious, active decision rather than a passive acceptance of the risk.

1. CORPORATE GOVERNANCE

The Company retains a Board of Directors to ensure best practice corporate governance and to ensure that shareholder interests are held paramount. The majority of the Board will be independent. The minimum and maximum number of directors will comply with the NZX Listing Rules.

The Board must be kept informed of key risks to the business on a continuing basis (see Risk Reporting Systems below).

The Board meets a minimum of six times a year and is provided with accurate timely information on all aspects of the Company's operations.

2. AUDIT AND RISK COMMITTEE

An Audit and Risk Committee has been established to provide assistance to the Board in fulfilling its responsibilities in relation to financial reporting, internal control structures, risk management systems, and the external audit function.

The Committee operates under a Charter. The Committee shall maintain direct lines of communication with the external auditor, the Corporate Manager and those responsible for non-financial risk management.

The Corporate Manager shall be responsible for drawing to the Committee's immediate attention any material matter that relates to the financial condition of the Company, any material breakdown in internal controls and any material event of fraud or malpractice.

3. OUTSOURCING

Marlin Global's policy is to minimise risk and to ensure independence and separation from the Manager by seeking specialist help from experts whenever best practice skills are not retained within the business:

Key areas where Marlin Global engages specialist help include:

- Investment Management
- Legal advice
- Tax planning and review of tax calculations
- Custody Services and Investment Accounting Services
- Registry Services
- Independent actuarial review of the performance returns and performance fee calculations
- External auditor review of the performance fee calculations
- ESG compliance and reporting

Outsourcing offers protection to reduce the risk of either not identifying a major risk, making a significant error in key processes, not being able to provide adequate segregation of duties or making uninformed decisions where there is no specialist expertise in-house. Additional protection is provided through the ability to take legal action against any suppliers who provide services or advice that is inadequate.

Suppliers will be selected on the basis that they use best practice, are experienced, skilled and have substance behind them to support any claim Marlin Global may make.

A Service Level Agreement between Marlin Global and its custody services provider has been established and agreed covering the detailed level of service and internal controls that exist in relation to custody services and investment accounting.

Marlin Global requires its Custodian to conduct a six-monthly assessment of their internal control processes (known as 'negative assurance' work) in addition to the annual year end external audit process. The Custodian's auditor provides negative assurance opinions, which describe any weaknesses in internal controls and systems that may have come to the attention of the auditor in the conduct of their review of accounting records and systems of internal control.

The Corporate Manager is responsible for monitoring supplier relationships and updating the Board on any issues.

4. KEY INTERNAL CONTROLS

Key controls are:

- The definition of responsibilities and delegated authorities. These are contained in the Management Agreement and Administration Services Agreement with the Manager, the Services Agreement and Service Level Agreement with the Custodian, and the Registry Services Agreement, CRS and FATCA Computershare Agreements and Warrant Agreements with the Registrar.

- The Board ensures that the Corporate Manager and other members of the Corporate Management team are properly qualified and experienced to enable them to effectively discharge their duties.

- The Company documents its internal controls, and these are updated and reviewed by the Board at least annually and when changes to process and procedures occur.

- Review and approval by the Board of all significant business matters.

The Corporate Manager is responsible for monitoring and developing adequate control systems.

5. RISK REPORTING SYSTEMS

Reporting systems will remain in place at all times to:

- Encourage focus on the identification of risks.
- Ensure a programme for managing compliance obligations is in place and monitored.
- Highlight mitigation plans required to manage risk on a regular basis.
- Ensure the Board is kept informed of business, operational and compliance risks.

The following reports shall be provided to the Board to meet these objectives:

- Compliance Plan; a list of all legal and regulatory compliance requirements for Marlin Global Limited. (Bi-monthly board reports).

- Reporting to the Board on current business risks, mitigation plans and likely impact on the business, including Financial Statements, budgets/forecasts and the Performance Fee calculations.

- Monthly Manager's Report including Investment Mandate compliance and Directors Certificate in accordance with the Management Agreement.

- A review of the Company's internal controls and their effectiveness (bi-annually);

- Audit and Risk Committee report and Auditor's/Accountants' report from the external auditor bi-annually.

6. BUSINESS CONTINUITY PLANNING

Marlin does not have its own Business Continuity Plan (BCP), rather it relies on the BCP arrangements that are in place and operating within the external parties that Marlin has outsourced agreements with, being:

- Fisher Funds Management Limited (FFM) – Management and Administration.
- Apex Investment Administration (NZ) Limited (Apex) – Investment Accounting and Custody; and
- Computershare Investor Services Limited – Share and Warrant Registry.

At regular intervals the Marlin Corporate Manager reviews the BCP arrangements of the out-sourced providers and/or obtains proof of their BCP arrangements via either six-monthly key control audit reports (as is the case for Apex), or relies on the annual registry audits (as is the case for Computershare's registry), or relies on the Annual Risk Assurance Certificates (as is the case for FFM).

It is expected that FFM, Apex and Computershare maintain adequate disaster recovery and continuity processes to ensure that their businesses are not materially or adversely impacted by loss of access to premises, loss of computer systems or other technology.

7. INSURANCE

Where a significant risk has been identified and other risk management tools prove to be too expensive or not as effective, we shall seek to mitigate that risk through insurance.

Insurance is not our key risk protection mechanism as we will firstly seek to avoid adverse events occurring, but it does play a part in our overall risk management strategy.

It is our policy to take advice from professional insurance brokers as to the type and level of cover that is considered best practice for organisations of our size and nature.

Insurances held include:

- Directors and Officers; and
- Statutory Liability

It is policy to review Marlin Global insurance requirements at least every 18 months.