

LTE Group Risk Management Policy

Policy Statement

Effective risk management is integral to LTE Group's operations and strategy. It is part of the Group's culture, values and decision-making processes and helps to protect learners, colleagues, assets and stakeholders.

The Group's objectives can be influenced by an enormous variety of risks and opportunities, and whilst it would be impossible to identify all these risks and opportunities, a level of risk is both inevitable and necessary. It is therefore important to focus on high risks which allow for early warning of when lower-level risks become more imminent or start to take effect enabling the Group to focus on those issues which will provide a view of the Group's health and highlight those areas that may become a risk to the survival of the company if left unchecked.

To manage risks effectively to help to achieve the Group's ambitions and deliver strategic objectives, a clear risk management framework is in place, with defined responsibilities and accountability arrangements at every level of the Group.

This policy statement sets out the governance structures in place to ensure that risks are managed and escalated as appropriate.

1. Purpose

This policy establishes a structured and consistent approach to risk management, ensuring that risks are effectively identified, assessed, managed and monitored across LTE Group. By integrating risk management into organisational activities, policy making, planning and decision-making, the Group will strengthen its ability to mitigate potential threats while maximising opportunities.

A robust risk management framework will be maintained to provide assurance to the Board that strategic and operational risks are being actively managed. The framework will support informed decision-making, efficient resource allocation, and proactive risk mitigation, minimising the likelihood of adverse events such as financial losses, regulatory breaches, or operational disruptions, that could negatively impact the organisation.

Specifically, this policy aims to:

- Safeguard the Group's assets, reputation, and operations through proactive risk identification, control and mitigation.
- Ensure compliance with regulatory and legal obligations, minimising legal and financial penalties.
- Ensure organisational resources are used to address the most critical risks.
- Encourage colleagues to engage with risk management, fostering a culture of awareness, accountability and continuous learning across the Group.
- Identify, assess and manage risks and opportunities related to service delivery.
- Balance risk mitigation efforts with strategic objectives and operational efficiency to maximise opportunities and reduce threats.

The risk management processes outlined in this policy are fundamental to achieving the strategic aims and business plan objectives of LTE Group. By systematically identifying, assessing, and managing risks, the Group ensures that decision-making is informed, resilient, and aligned with long-term objectives. The structured risk management framework enables the early identification of potential threats and opportunities, allowing

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the Group to take proactive measures that safeguard assets, support innovation, and enhance operational efficiency.

Through effective risk governance, including oversight from the Board, Audit and Risk Committee, and Executive Team, the Group ensures that risk considerations are embedded at every level of planning and execution. This approach not only protects the Group's ability to deliver high-quality education and services but also strengthens its adaptability in an evolving external environment.

By linking risk management to strategic priorities, LTE Group enhances its capacity to achieve sustainable growth while maintaining compliance, financial stability, and stakeholder confidence.

2. Scope

This policy applies to all LTE Group colleagues, contractors, and stakeholders across strategic, operational and project levels.

3. Risk Management Framework

The Group's risk management framework aligns with best practice (e.g., ISO 31000 and COSO), is demonstrated in Section 4 of Risk Management Arrangement's document and includes:

- **The Three Lines of Defence model**
- **Horizon Scanning** – Regular assessments with the Executive Team to identify emerging risks.
- **Risk Management Processes** - Appetite, Identification, Assessment, Treatment, Monitoring, Reporting, Continuous Improvement and Risk Maturity.
- **Communication & Training** – The Thrive training platform ensures compliance with mandatory training requirements.

To support the identification, assessment, monitoring and reporting of risks, the Group utilises a digital risk management system, ensuring a consistent and structured approach to risk management.

4. Roles and Responsibilities

Risk Owner	Responsible for identifying, assessing, and managing risks, ensuring that risks are clearly recorded in risk registers and actively monitored, and putting appropriate controls in place.
Board	Sets risk management appetite and goals, ensures integration of risk management into strategic planning, ensuring alignment with stakeholder needs, and internal and external threats.
Audit and Risk Committee (ARC)	Reviews the effectiveness of risk management in the organisation, and ensures compliance with governance requirements.
Chief Executive Officer	Provides leadership and allocates resources for risk

	management.
Chief Financial Officer (CFO)	Oversees internal controls and financial risk mitigation.
Executive Team	Applies the risk management framework, approves the Corporate Risk Register, and ensures risks are being managed effectively and on a timely basis.
Group Risk Forum	Guides risk management practices, recommends improvements, and tracks the Group's risk exposure.
Business Units, Project Teams and Colleagues	Identifies, assesses, and escalates risks, and participates in risk management training and awareness initiatives.
Policy Owner	Responsible for drafting, reviewing and publicising this policy.
Internal Audit	Provides assurance on risk management effectiveness through independent audits.

More in-depth responsibilities for the key roles above are provided in Section 5 of the Arrangements for Risk Management.

5. Risk Appetite

ISO 31000 defines risk appetite as the level of risk an organisation is willing to accept in pursuit of its objectives. LTE Group's Board and Executive Team determine and continuously assess the organisation's risk appetite, ensuring that planning and decision-making reflects this assessment.

Further details about the Group's risk appetite approach can be found in Section 7 of the Arrangements for Risk Management.

6. Risk Monitoring and Continuous Review

LTE Group maintains a proactive approach to risk oversight through ongoing monitoring and structured quarterly reviews which includes:

- **Ongoing Monitoring** – The Risk Management Group ensures that risk registers are updated continuously to reflect emerging risks, keeping the organisation responsive to potential threats.
- **Quarterly Reviews** – Formal risk reviews are conducted every quarter at the Executive Team level, ensuring strategic oversight, prior to submission for approval by the Audit and Risk Committee.

7. Policy Governance, Review and Approval

This group policy is reviewed and approved by the Executive Team and the Board of Governors, and this version of the policy stays effective until it is withdrawn, or an update approved. The policy will be reviewed on an annual basis. However, if any material changes are needed to this policy prior to its annual review, reapproval will be sought.

8. Information, Communication and Training

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The policy will be stored on the Hub and communicated through internal communications channels as appropriate.

9. Policy Monitoring and Breaches

It is a mandatory requirement for all colleagues to fully comply with the requirements of approved LTE Group policies. Where breaches of the policy occur, they should be reported to the policy's Accountable SMF (see concluding section) and to the Group Risk and Compliance Director.

10. Associated Policies and Documents

POLICIES	PROCEDURES & OTHER DOCUMENTS
	Arrangements for Risk Management and supporting appendices: <ol style="list-style-type: none">1. Risk Appetite2. Risk Identification3. Risk Assessment and Scoring Methodology4. Risk Monitoring5. Risk Reporting6. Internal Audit and Assurance7. Risk Maturity Model
	Financial Statements 31 July 2024 – Annual Report

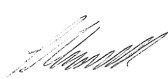
11. Definitions

TERM	DEFINITION
ISO3001	The internal standard for risk management. It provides principles, a framework and guidelines to help organisations to manage risk effectively.
COSO	Committee of Sponsoring Organisations of the Treadway Commission), it is a framework for enterprise risk management, internal control, and fraud deterrence. It provides guidelines for organisations to improve governance, risk management, and internal controls.
Colleagues	All employees of the group

12. Version Control and Accountability

Version number	Version 6.1
Policy Owner	Group Risk Manager

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Accountable SMF		Director of Risk and Compliance			
Approved by		Chief Executive Officer		Signature: 	
Approval Date		April 2025	Next Review Date		April 2026
Version	Status	Date	Revision Reason	Reviewed by	Outcome
7	Final	09/04/2025	Annual Review	Group Risk Manager	Approved

APPENDIX A: EQUALITY IMPACT ASSESSMENT (EIA)

This risk policy has been assessed for its impact on protected equality groups as below. The assessment has not identified potential areas where specific groups may face disproportionate risks which would have a negative impact on any protected groups within the workforce and other stakeholders (e.g., learners, contractors, visitors).

Are there concerns that this policy could have an adverse impact on any of these protected characteristics?		If Yes, is action required?
Age	No	N/A
Disability	No	N/A
Gender reassignment	No	N/A
Marriage or civil partnership	No	N/A
Pregnancy and maternity	No	N/A
Race	No	N/A
Religion	No	N/A
Sex	No	N/A
Sexual orientation	No	N/A
EIA Summary		
Person responsible for EIA	Lourell Harris and Louisa Hawkes	
EIA Outcome & statement		