



IMPULSUS

RISK MANAGEMENT POLICY STATEMENT

Version 2.0

Ian Storey – Reviewed on April 11th 2026

Impulsus | UK

Impulsus Risk Management Policy Statement

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2 Purpose

The purpose of this policy is to outline the processes and policies for risk management at Impulsus. We believe it is of vital importance and risk management is integrated within the core management activities.

3 Commitment to risk management

Impulsus is fully committed to managing risk within its control, to keep employees safe, protect assets, maintain and improve its services, and make good use of funds, as part of good corporate governance.

4 Operational Risk

Operational risk is the risk of financial losses and negative social performance related to failed people, processes, and systems in daily operations. As Impulsus grows it becomes increasingly important to manage these effectively. There are five categories of operational risk: people risk, process risk, systems risk, external events risk, and legal and compliance risk.

4.1 People Risk

People risk is the risk of financial losses and negative social performance related to inadequacies in human capital and the management of human resources. This encompasses the inability to attract, manage, motivate, develop, and retain competent resources and often results in human errors, fraud, or other unethical behaviour, both internal and external to the institution.

4.2 Process Risk

Process risk is the risk of financial losses and negative social performance related to failed internal business processes within every aspect of the business. This can include product design flaws and internal project failures.

4.3 Systems Risk

Systems risk is the risk of financial losses and negative social performance related to failed internal systems. This encompasses colleague connectivity, management information and other technical systems.

4.4 External Events Risk

External events risk is the risk of financial losses and negative social performance related to the occurrence of external events typically outside of our control. This encompasses both natural disasters such as hurricanes, flooding, earthquakes, and fires, as well as man-made events such as civil disruptions, war, robberies, arson, road blockades, and terrorist attacks.

4.5 Legal and Compliance Risk

Legal and compliance risk is the risk of financial losses and negative social performance related to non-compliance with internal and external regulations and laws.

5 Creation of Risk Forum

Impulsus take an inclusive approach to managing risk by establishing a forum representing all areas of the firm. This forum will be a focal point for promoting risk management, ensuring that all employees understand their role in managing risk and share good practices.

6 Commitment to integration

We will *manage risk* through all the activities Impulsus, *including management activities such as planning, monitoring, design, and decision-making* and make it part of the culture of Impulsus.

Risk management is a key part of our partnership model. Transparency is a critical to the development of trust in our client relationships. As part of this policy we endeavour to inform clients of material risks that impact our services within 24 hours. These risk include system failures, employee error, fraud or other criminal activity.

7 Commitment to formality

We will do this through a planned, deliberate approach, that continues to improve and encompasses our formal systems, processes, and structures, and also the behaviours of our people from day to day.

We will continue to develop this risk management policy, which will be underpinned by risk registers to record risks and their management systematically, and will review these risk registers regularly to make sure that risks are managed within our risk appetite.

We will maintain a risk register to manage risks. This will track ownership remediation actions and points for next review.

Material operational incidence will be recorded and root cause analysis will be conducted to ensure that the appropriate steps are taken to drive continuous improvement.

8 Commitment to continuous improvement

Through this policy Impulsus will continue to promote risk management, allowing us to build on our successes and reduce failures.

Ian Storey

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