

Beforepay Group Limited

ASX Announcement (ASX: B4P)

30 October 2023

Beforepay Q1 FY24 Quarterly Activities and Appendix 4C Cash Flow Report (Unaudited)

Beforepay posts quarterly profit of \$1.64m

Beforepay Group Limited (Beforepay or the Company) (ASX: B4P) has released its Appendix 4C for the quarter ended 30 September 2023 (Q1 FY24).

Key Q1 FY24 Highlights:

- Beforepay achieved a net profit before tax of \$1.64m and an EBITDA of \$2.61m. This is the company's first quarterly net profit.
- Advances of \$177.3m, up 27% on Q1 FY23 (year-on-year or YoY) and up 9% on Q4 FY23 (quarter-on-quarter or QoQ).
- Net defaults declined to 0.9%, an improvement from 1.6% in Q1 FY23. This was driven by
 improvements to the risk model and limit management, continued strong recoveries, seasonal
 effects, and a writeback of Q4 FY23 expected loss provisions in Q1 FY24. As previously noted,
 Beforepay's business is seasonal, and the first quarter generally shows the best default
 outcomes of any quarter in the year.
- Net transaction margin (NTM) was \$5.63m, up from \$4.09m or 38% QoQ and up 74% YoY from \$3.23m in Q1 FY23. This result was driven by growth in advance volume and the lower level of defaults.
- Customer acquisition cost (CAC) of new users declined 62% YoY to \$27.
- Disciplined cost management, with operating expenses down 29% YoY and 10% QoQ, to \$3.95m.
- Strong balance sheet with cash on hand of \$17.2m and an equity position of \$28.7m. Beforepay continues to carry no debt at the operating-company level, only debt that finances receivables.
- Beforepay announced on 18 October 2023 that it has secured a new 3-year, \$55m debt facility with Balmain Group and Longreach Credit Investors to facilitate future lending growth.
- A second ethical-lending award, 2023 Ethical Lender of the Year, in the Wealth & Finance International FinTech Awards.

Beforepay CEO Jamie Twiss said, "I'm proud to be announcing Beforepay's first quarterly profit today. This result shows that Beforepay has successfully executed its strategy, delivering strong top-line growth and good unit economics while tightly controlling costs, and demonstrates the resilience and sustainability of our business. While we expect that future quarterly results may be up or down, given the seasonality in our business, we are confident that Beforepay is well positioned for the future."

Overview

	Q1 FY24	Q1 FY23	Q4 FY23	YoY Change %	QoQ Change %
Platform metrics					
Advances	\$177.3m	\$139.2m	\$162.2m	27%	9%
Average advance	\$386	\$388	\$341	(1%)	13%
Active users (no. users)1	234,848	185,075	234,034	27%	-%
Financial metrics					
Beforepay income	\$8.53m	\$6.46m	\$7.85m	32%	9%
Net defaults % (of advances plus fees) ²	0.9%	1.6%	1.4%	(44%)	(36%)
Net transaction margin	\$5.63m	\$3.23m	\$4.09m	74%	38%
Net transaction margin % (of advances)	3.2%	2.3%	2.5%	39%	28%
EBITDA (excluding one- off and significant items)	\$2.61m	(\$1.91m)	\$0.54m	Large	381%
NPBT (excluding one-off and significant items)	\$1.64m	(\$2.63m)	(\$0.46m)	Large	Large

Net Transaction Margin and Operating Expenses (\$m) By Quarter



	Q1 FY24	Q4 FY23	Change (\$)	
Balance sheet				
Cash position	\$17,192,546 ³	\$21,777,857	\$4,585,311	
Equity position	\$28,654,404	\$26,827,424	\$1,826,980	

¹ Customers of Beforepay who have taken out an advance in the previous 12 months from the relevant date. This includes customers who have not yet repaid their most recent cash out and are not eligible to re-borrow until they have done so.

² Net defaults were referred to as net transaction loss in previous releases.

³ Cash position as at 30 September 2023 represents statutory cash and cash equivalents (excluding cash held by third parties).



Financial Performance - Q1 FY24

- Total advances grew by 27% YoY to \$177.3m driven by both new customer acquisition and continued usage by existing customers. The volume of total advances grew 9% QoQ with the average advance size increasing 13% to \$386.
- Active users grew by 27% YoY to 234,848 and flat QoQ (234,034). New user growth was lower in the quarter due to seasonality as well as continued low marketing spend.
- Beforepay income increased 32% YoY to \$8.53m in Q1 FY24, up 9% on Q4 FY23 (\$7.85m). The QoQ increase reflects both the increase in advance volume as well as the timing of revenue recognition, as Beforepay generates its revenue through charging users a fixed fee of 5% per advance, which is recognised over the period in which the customer advance is repaid.
- Net defaults % declined to 0.9%, down 36% QoQ and 44% YoY. Key improvements in recent
 months include continued improvements to limit management and continued upgrades to the
 credit model. Net defaults also benefited from higher recoveries of \$1.93m, which continued to
 perform well during the quarter, as well as a writeback of \$1.27m of expected loss provisions
 taken in Q4 FY23.
- Direct service costs as a percentage of advances were down slightly at 0.2% in Q1 FY24 (previously 0.3% in Q4 FY23). Our direct service costs generally do not vary with the size of the advance.
- Net transaction margin % increased 39% YoY to 3.2% compared to Q1 FY23 (2.3%), driven primarily by lower net defaults, and up 28% from Q4 FY23 (2.5%). Net transaction margin in dollar terms increased to \$5.63m, up 74% YoY and 38% from Q4 FY23 (\$4.09m).
- Total operating expenses (excluding one-off and/or significant items) were \$3.95m in Q1 FY24, down 10% from \$4.41m in Q4 FY23 and down 29% from \$5.57m in Q1 FY23, reflecting continued tight cost control.
- Within these operating expense numbers, advertising and marketing expenses attributable to customer acquisition were \$0.59m in Q1 FY24, 18% lower than \$0.72m in Q4 FY23. This was primarily driven by continued focus on optimising performance marketing expenditure. However, due to a 31% QoQ decline in new user growth to 19,592 in Q1 FY24, this resulted in the average customer acquisition cost (CAC) increasing 17% to \$27 during the quarter. Employee, general and administration and other costs were \$3.36m in Q1 FY24, 9% lower than Q4 FY23 (\$3.69m).
- EBITDA was \$2.61m, a significant improvement from \$0.54m in Q4 FY23, driven by the increase in net transaction margin due to lower net defaults in the quarter.
- The business achieved NPBT of \$1.64m in the quarter, the company's first quarterly profit.

Outlook

- Consistent with previous years, management expects Q2 FY24 will show higher growth and also higher net defaults than Q1 FY24. Quarter-to-date trading has been consistent with this outcome.
- Recent CAC and operating expense levels have been consistent with Q1 FY24.
- The Company may see some increases in its cost base as it starts more actively exploring
 additional growth opportunities. It may also restore some of the recent reductions to marketing
 expenditure. Neither of these costs are likely to be very significant in Q2 FY24.

Balance sheet

- Our underlying reported cash on hand⁴ as at Q1 FY24 was \$17.2m, compared to \$21.8m at Q4 FY23. Cash decreased by \$4.6m during the quarter, comprising (\$4.5m) cash from operating activities, \$Nil cash from investing activities and (\$0.1m) cash from financing activities. The reduction in cash from operating activities primarily reflected the growth in the loan book driven by growth in the volume of advances, as Beforepay funded all growth from its own cash in the quarter.
- As at Q1 FY24, Beforepay had drawn \$33.3m under its third-party debt facility (\$11.7m undrawn).
 During Q1 FY24 we did not draw on this facility. The third-party debt facility has a capacity which increases to \$45.0m by December 2023 and expires in January 2024.
- Beforepay has secured a new 3-year debt facility agreement for \$55m with Balmain Group and Longreach Credit Investors as lenders. As announced on the 18 October, the new debt facility was used to refinance the prior debt facility with Longreach, which was repaid. Going forward, the new facility will be used to support continued business growth.
- The total equity position was \$28.7m at the end of Q1 FY24. This compares to \$26.8m in Q4 FY23, reflecting the profitable quarter.
- Beforepay retains a highly capital efficient model with an average advance duration⁵ of approximately 26 days. As a result, the third-party funding cost of the average advance⁶ is c.0.87% of the amount advanced, based on a 26-day loan duration.

Growth strategy

- Beforepay continues to be focused on growing its core business efficiently, acquiring additional
 wage-advance customers in Australia through a mixture of organic growth and paid marketing,
 with a marginal acquisition cost below customer value.
- The Company remains focused on continuing to grow without adding significant cost to the current operating expense base.
- Beforepay is currently reaching out to organisations about potential partnerships to leverage Beforepay's technology and risk-management tools and for offerings in new jurisdictions.

Our business

- Beforepay remains committed to providing an ethical, transparent, customer-friendly product to help working Australians manage temporary and short-term cash-flow challenges.
- In Q1 FY24 Beforepay won the Ethical Lender of the Year 2023 awarded by Wealth and Finance International. The award recognises Beforepay's commitment as a mission-driven organisation to provide working Australians with a safe and affordable alternative to navigating temporary cashflow challenges.
- Our product advances customers small sums of money (Q1 FY24 average of \$386) against their future wages over short periods of time, which helps them get through short-term challenges whilst not living beyond their means. Beforepay makes ongoing enhancements to customers' eligibility criteria and risk assessments.
- Our fee model is simple, transparent, and affordable, and gives our customers total control, charging only a small 5% transaction fee, zero interest, and never any late fees (or any other

⁴ The cash-on-hand figure of \$17.2m (excludes \$4.7m in cash held by third parties to fund customer advances). This compares to \$21.8m cash-on-hand as at Q4FY23 (which excludes \$3.4m of cash held by third parties.)

⁵ The weighted average time required across all advances in a period to fully repay the advance. Advances which default and remain unsettled are removed

⁶ The total dollar value of advances in a period divided by the number of advances in that period.



fees).

- If a customer does not pay back within the required time, the only penalty is that the service is suspended.
- Beforepay's service remains well regarded by customers, with an average 4.7 star rating (out of 5) across the Google Play Store and Apple App Store.

Our customers

- Between July 2023 and September 2023, 71% of our customers were in full-time employment, 14% were part-time, 12% were in casual employment, and 3% were other⁷.
- The average annual individual customer gross income was \$61,347 during September 2023 (counting only the main source of income)⁸. This is compared to the ABS's national median income of \$63,000 (as of August 2022)⁹.
- The four main employment industries for our customers were construction at 13%, healthcare and social services at 10%, retail trade at 11% and hospitality and restaurant services at 11%.

⁷ Customer employment type in customers who took out an advance in September 2023. Employment type is derived from customer disclosures only.

⁸ The average annual individual customer gross income has been derived from all customers who borrowed in September 2023. The average annual individual customergross income is derived using the annualised net income identified by Beforepay's pay cycle detection tool, which is then grossed up using the ATO tax tables. Therefore, Beforepay's average annual individual customer gross income figure may be understated due to ignoring any secondary sources of income.

 $^{^9~}https://www.abs.gov.au/statistics/labour/earnings-and-working-conditions/average-weekly-earnings-australia/latest-release$

Appendix 1: Use of Funds

Pursuant to Listing Rule 4.7C.2, the Company confirms that since listing on the ASX, it has incurred expenditure as detailed below, with the Use of Proceeds set out in column 2 of the table. The Company is well funded to achieve its strategic objectives and planned activities. As previously announced, the expenditure incurred reflects the company's shift in focus to a path to profitability and delivering growth in Australia rather than overseas expansion.

Intended Use of Funds \$m	Replacement Prospectus dated 29 Nov 2021	Actual Spend Since IPO (Jan 2022 - Sep 2023)	Commentary
Funding increase in loan book	\$5.9m	\$8.6m	Funding the growth in our 20% equity funded portion of the gross loan book since January 2022 has driven this increase in actual spend
Marketing and customer acquisition	\$16.9m	\$11.9m	Direct digital customer acquisition and above the line marketing spend has been lower than allocated as a result of the company's shift to digital marketing and move away from higher cost advertising (such as above the line advertising)
Overseas expansion focused on the US	\$7.6m	\$0.3m	Costs in exploring opportunities for future growth expansion in the US have been lower than allocated as a result of the company's shift in focus to a path to profitability and delivering on growth in its current geographies rather than overseas expansion
Costs related to the IPO offer	\$4.6m	\$4.6m	Advisor fees (legal, compliance, tax and accounting advisors) under the Underwriting Agreement, ASX listing costs and Prospectus insurance
Total	\$35.0m	\$25.4m	

In accordance with Listing Rule 4.7C, payments made to related parties and their associates included in item 6.1 of the Appendix 4C was A\$226,939 that comprised of payments made to Non-Executive Directors relating to salary and wages (inclusive of superannuation and applicable taxes withheld) and Director fees on standard terms.

This announcement has been authorised for release to the ASX by the Board.



For more information, please contact:

Investors	Media
Danny Younis	Noeleene Yap
Investor Relations, Beforepay	Marketing & Communications Manager Beforepay
Ph: 0420 293 042	Ph: 0489 995 082
investorrelations@beforepay.com.au	mediaenquiries@beforepay.com.au

About Beforepay

Beforepay was founded in 2019 to support working Australians who have not been well-served by the traditional financial-services industry. The product is an ethical, customer-friendly way to help people manage temporary cash-flow challenges. We provide our customers with early access to a portion of their pay, on-demand, in exchange for a single fixed fee, which helps them to get through short-term challenges whilst not living beyond their means. For more information visit www.beforepay.com.au.

Important notice

This announcement contains selected summary information only and is provided for general information purposes only. It should be read in conjunction with Beforepay Group's continuous disclosure announcements available at www.beforepay.com.au/investor-hub/asx-announcements. Nothing in this announcement constitutes financial product, investment, legal, tax, accounting or other advice and it is not to be relied upon in substitution for the recipient's own exercise of independent judgment regarding the operations, financial condition and prospects of the Beforepay Group. Before making an investment decision, the recipient should consider its own financial situation, objectives and needs, and conduct its own independent investigation and assessment of the contents of this announcement, including obtaining investment, legal, tax, accounting and such other advice as it considers necessary or appropriate.

This announcement has been prepared without taking account of any person's individual investment objectives, financial situation or particular needs. The information in this announcement has been obtained from and based on sources believed by Beforepay Group to be reliable. To the maximum extent permitted by law, no member of the Beforepay Group makes a representation or warranty, express or implied, as to the accuracy, completeness, timeliness or reliability of the contents of this announcement. To the maximum extent permitted by law, no member of the Beforepay Group accepts any liability (including, without limitation, any liability arising from fault or negligence) for any loss whatsoever arising from the use of this announcement or its contents or otherwise arising in connection with it.

This announcement may contain forward-looking statements, guidance, forecasts, estimates, prospects, projections or statements in relation to future matters ('Forward Statements'). Forward Statements can generally be identified by the use of forward-looking words such as "anticipate", "estimates", "will", "should", "could", "may", "expects", "plans", "forecast", "target" or similar expressions. Forward Statements including indications, guidance or outlook on future revenues, distributions or financial position and performance or return or growth in underlying investments are provided as a general guide only and should not be relied upon as an indication or guarantee of future performance. No independent third party has reviewed the reasonableness of any such statements or assumptions. No member of the Beforepay Group represents or warrants that such Forward Statements will be achieved or will prove to be correct or gives any warranty, express or implied, as to the accuracy, completeness, likelihood of achievement or reasonableness of any Forward Statement contained in this presentation. Except as required by law or regulation, Beforepay Group assumes no obligation to release updates or revisions to Forward Statements to reflect any changes. This announcement includes information regarding past performance of Beforepay Group and investors should be aware that past performance is not and should not be relied upon as being indicative of future performance.

Investors should note that certain financial data included in this announcement is not recognised under the Australian Accounting Standards and is classified as 'non-IFRS financial information' under ASIC Regulatory Guide 230 'Disclosing non-IFRS financial information' ('RG 230'). Beforepay Group considers that non-IFRS information provides useful information to

users in measuring the financial performance and position of the Beforepay Group. The non-IFRS financial measures do not have standardized meanings under Australian Accounting Standards and therefore may not be comparable to similarly titled measures determined in accordance with Australian Accounting Standards. Readers are cautioned therefore not to place undue reliance on any non-IFRS financial information and ratios in this announcement. All dollar values are in Australian dollars (\$ or A\$) unless stated otherwise. All figures are unaudited. Change percentages are calculated using unrounded figures and may differ slightly from a number calculated using rounded figures.

Appendix 4C

Quarterly cash flow report for entities subject to Listing Rule 4.7B

Name of entity

ABN Quarter ended ("current quarter")
63 633 925 505 30 September 2023

Con	solidated statement of cash flows	Current quarter \$A'000	Year to date (3 months) \$A'000
1.	Cash flows from operating activities		
1.1	Receipts from customers ¹	178,187	178,187
1.2	Payments for		
	(a) research and development		
	(b) product manufacturing and operating costs	(399)	(399)
	(c) advertising and marketing	(590)	(590)
	(d) leased assets		
	(e) staff costs	(2,111)	(2,111)
	(f) administration and corporate costs	(1,410)	(1,410)
1.3	Dividends received (see note 3)		
1.4	Interest received		
1.5	Interest and other costs of finance paid ²	(936)	(936)
1.6	Income taxes paid		
1.7	Government grants and tax incentives		
1.8	Other (provide details if material) ³	(177,271)	(177,271)
1.9	Net cash from / (used in) operating activities	(4,530)	(4,530)

2.	Cash flows from investing activities	
2.1	Payments to acquire or for:	
	(g) entities	:
	(h) businesses	

ASX Listing Rules Appendix 4C (17/07/20) + See chapter 19 of the ASX Listing Rules for defined terms.

¹ Receipts from customers comprises repayment of customer advances, inclusive of Beforepay fees income

 $^{^{\}rm 2}$ Interest associated with the Debt Facility which funds customer pay advances

³ Payments to customers comprises cash outs (Pay Advances) to customers)

Cons	solidated statement of cash flows	Current quarter \$A'000	Year to date (3 months) \$A'000
	(i) property, plant and equipment	(3)	(3)
	(j) investments		
	(k) intellectual property		
	(I) other non-current assets		
2.2	Proceeds from disposal of:		
	(a) entities		
	(b) businesses		
	(c) property, plant and equipment		
	(d) investments		
	(e) intellectual property		
	(f) other non-current assets		
2.3	Cash flows from loans to other entities		
2.4	Dividends received (see note 3)		
2.5	Other (provide details if material)		
2.6	Net cash from / (used in) investing activities	(3)	(3)

3.	Cash flows from financing activities		
3.1	Proceeds from issues of equity securities (excluding convertible debt securities)	45	45
3.2	Proceeds from issue of convertible debt securities		
3.3	Proceeds from exercise of options		
3.4	Transaction costs related to issues of equity securities or convertible debt securities		
3.5	Proceeds from borrowings ⁴		
3.6	Repayment of borrowings		
3.7	Transaction costs related to loans and borrowings		
3.8	Dividends paid		
3.9	Other (provide details if material) ⁵	(97)	(97)
3.10	Net cash from / (used in) financing activities	(52)	(52)

 $^{^{\}rm 4}$ Borrowings from the debt facility to fund customers cash outs (Pay Advances)

⁵ Repayment of lease

Consolidated statement of cash flows		Current quarter \$A'000	Year to date (3 months) \$A'000
4.	Net increase / (decrease) in cash and cash equivalents for the period		
4.1	Cash and cash equivalents at beginning of period	21,778	21,778
4.2	Net cash from / (used in) operating activities (item 1.9 above)	(4,530)	(4,530)
4.3	Net cash from / (used in) investing activities (item 2.6 above)	(3)	(3)
4.4	Net cash from / (used in) financing activities (item 3.10 above)	(52)	(52)
4.5	Effect of movement in exchange rates on cash held		
4.6	Cash and cash equivalents at end of period	17,193	17,193

5.	Reconciliation of cash and cash equivalents at the end of the quarter (as shown in the consolidated statement of cash flows) to the related items in the accounts	Current quarter \$A'000	Previous quarter \$A'000
5.1	Bank balances	17,193	21,778
5.2	Call deposits		
5.3	Bank overdrafts		
5.4	Other (provide details)		
5.5	Cash and cash equivalents at end of quarter (should equal item 4.6 above)	17,193	21,778

Payments to related parties of the entity and their associates	Current quarter \$A'000
Aggregate amount of payments to related parties and their associates included in item 1	227
Aggregate amount of payments to related parties and their associates included in item 2	
•	Aggregate amount of payments to related parties and their associates included in item 1 Aggregate amount of payments to related parties and their

The company made payments to Executive & Non-Executive Directors relating to Salaries & Wages (inclusive of superannuation and applicable taxes withheld) and Directors Fees on normal commercial terms. Not included are any non-cash items (i.e. convertible note interest).

ASX Listing Rules Appendix 4C (17/07/20)

7.	Financing facilities Note: the term "facility' includes all forms of financing arrangements available to the entity. Add notes as necessary for an understanding of the sources of finance available to the entity.	Total facility amount at quarter end \$A'000	Amount drawn at quarter end \$A'000
7.1	Loan facilities	45,000	33,285
7.2	Credit standby arrangements		
7.3	Other (please specify)		
7.4	Total financing facilities	45,000	33,285
7.5	Unused financing facilities available at quarter end		11,715

7.6 Include in the box below a description of each facility above, including the lender, interest rate, maturity date and whether it is secured or unsecured. If any additional financing facilities have been entered into or are proposed to be entered into after quarter end, include a note providing details of those facilities as well.

AMAL Trustees Pty Ltd is trustee for the Longreach Direct Lending Fund (Longreach). There are no changes to existing financial covenants, including an interest rate of 9.5% per annum as provided in the Q4 FY23 statement. The financing facility has a capacity which increases to \$45 million by 15 December 2023 and expires in January 2024. Unused financing facilities available at quarter end is subject to meeting the Eligible Receivable test under the facility agreement.

8.	Estimated cash available for future operating activities	\$A'000
8.1	Net cash from / (used in) operating activities (item 1.9)	(4,530)
8.2	Cash and cash equivalents at quarter end (item 4.6)	17,193
8.3	Unused finance facilities available at quarter end (item 7.5)	11,715
8.4	Total available funding (item 8.2 + item 8.3)	28,908
8.5	Estimated quarters of funding available (item 8.4 divided by item 8.1)	6.38
	Note: if the entity has reported positive net operating cash flows in item 1.9. answer item	85 as "N/Δ" Otherwise a

8.6 If item 8.5 is less than 2 quarters, please provide answers to the following questions:

figure for the estimated quarters of funding available must be included in item 8.5.

8.6.1 Does the entity expect that it will continue to have the current level of net operating cash flows for the time being and, if not, why not?

Answer: N/A

8.6.2 Has the entity taken any steps, or does it propose to take any steps, to raise further cash to fund its operations and, if so, what are those steps and how likely does it believe that they will be successful?

Answer: N/A

8.6.3 Does the entity expect to be able to continue its operations and to meet its business objectives and, if so, on what basis?

Answer: N/A

Note: where item 8.5 is less than 2 quarters, all of questions 8.6.1, 8.6.2 and 8.6.3 above must be answered.

Compliance statement

- This statement has been prepared in accordance with accounting standards and policies which comply with Listing Rule 19.11A.
- 2 This statement gives a true and fair view of the matters disclosed.

Date:	30 October 2023
Authorised by:	By the Board

Notes

- 1. This quarterly cash flow report and the accompanying activity report provide a basis for informing the market about the entity's activities for the past quarter, how they have been financed and the effect this has had on its cash position. An entity that wishes to disclose additional information over and above the minimum required under the Listing Rules is encouraged to do so.
- 2. If this quarterly cash flow report has been prepared in accordance with Australian Accounting Standards, the definitions in, and provisions of, *AASB 107: Statement of Cash Flows* apply to this report. If this quarterly cash flow report has been prepared in accordance with other accounting standards agreed by ASX pursuant to Listing Rule 19.11A, the corresponding equivalent standard applies to this report.
- 3. Dividends received may be classified either as cash flows from operating activities or cash flows from investing activities, depending on the accounting policy of the entity.
- 4. If this report has been authorised for release to the market by your board of directors, you can insert here: "By the board". If it has been authorised for release to the market by a committee of your board of directors, you can insert here: "By the [name of board committee eg Audit and Risk Committee]". If it has been authorised for release to the market by a disclosure committee, you can insert here: "By the Disclosure Committee".
- 5. If this report has been authorised for release to the market by your board of directors and you wish to hold yourself out as complying with recommendation 4.2 of the ASX Corporate Governance Council's *Corporate Governance Principles and Recommendations*, the board should have received a declaration from its CEO and CFO that, in their opinion, the financial records of the entity have been properly maintained, that this report complies with the appropriate accounting standards and gives a true and fair view of the cash flows of the entity, and that their opinion has been formed on the basis of a sound system of risk management and internal control which is operating effectively.