



## Risk Management Policy

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### 1. Introduction

This document sets out the risk management policy ("**Policy**") of the group comprising Starpharma Holdings Limited and its controlled entities (collectively "**Starpharma**" or "**Company**").

The Starpharma Board is committed to a proactive approach in managing material business risks, and aims to ensure that effective risk management practices are a key element of the Company's culture and in the way activities are carried out at all levels in the Company.

Starpharma operates in a challenging and dynamic environment, and risk management is viewed as integral to realising new opportunities as well as identifying issues that may have an adverse effect on the Company's existing operations and its sustainability. The Board and management recognise the importance of effective risk management in enabling the Company to fully capitalise on the opportunities available, as well as in mitigating potential loss.

This Policy was last reviewed and approved by the Board on 6 May 2025.

### 2. Responsibilities and Authorities

The allocation of risk management responsibilities and authorities across the following levels of the Company is as follows:

- The Board as set out in the Board Charter;
- The Audit and Risk Committee as set out in the Committee's Charter;
- The Chief Executive Officer and Chief Financial Officer/Company Secretary are responsible to the Audit and Risk Committee and Board for the overall implementation of risk management strategies, for reporting on risk to the Board and managing those risks;
- The Leadership Team are responsible for identifying, assessing and monitoring business risks, and ensuring recommended controls identified are implemented; and
- All Employees are responsible for identifying, assessing and reporting business risks relevant to their role, recommending appropriate risk mitigations to management, and implementing controls.

### 3. Risk Management Approach

Starpharma's risk management approach includes:

- Risk Profile and Identification – developing and maintaining a profile of risk assessment and control, and summarising material risks and actions proposed to effectively manage and control identified risks in a risk register;

- Risk Analysis – using a range of tools and techniques, including quantitative or qualitative assessment or a combination as applicable to systematically analyse the risks identified;
- Risk Appetite Evaluation – determining whether the level of risk is acceptable or unacceptable and giving priority to risks that have the greatest potential for organisational impact;
- Risk Treatment – applying a hierarchy of control to each risk; and
- Monitor and Review – maintaining the risk register that summarises all identified material risks, and providing it to the Audit & Risk Committee and/or Board for review at least annually.

The Risk Register identifies areas of risk currently relevant to Starpharma's operations, including, but not limited to the following:

- Operational
- Financial
- Regulatory
- Research & Development
- Commercial / Product / Partner
- Intellectual Property
- People

#### **4. Review**

This Policy is reviewed periodically to ensure it continues to comply with applicable laws and regulations and remains relevant and effective.

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