



## LUXFER HOLDINGS PLC RISK MANAGEMENT POLICY

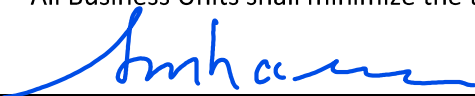
Luxfer Holdings PLC (“Luxfer” or the “Company”)<sup>1</sup> understands that risk is an inherent aspect of the dynamic business environment. The Company views risk management as a fundamental driver of effective corporate governance and an integral part of business operations. To minimize the adverse consequences of risks on the Company’s business objectives, Luxfer has framed this Risk Management Policy to provide guidance for risk management, bringing together policy and guidance from Luxfer’s Board of Directors.

Luxfer is dedicated to allocating the appropriate talent, resources, and physical and financial measures to ensure that its assets and employees are protected by minimizing losses through its risk management program. Systems have been developed to identify the key risks to the Company and minimize their impact by means of appropriate control procedures. Luxfer believes that risk management and its business functions are inseparable. Therefore, risk management systems should complement management’s actions in a cost-effective manner designed to achieve overall corporate goals.

To minimize the overall cost of risk and encourage a culture of commercial risk awareness, this Risk Management Policy provides a framework to guide the implementation of effective risk management systems. To ensure that appropriate decisions involving risk are made in a timely fashion throughout the Company, employees are expected to integrate these principles into their job functions.

***To this end, Luxfer has defined the following objectives:***

- All Business Units shall follow the Luxfer Model and focus on technical excellence, manufacturing excellence, strong customer relationships, specialist markets and innovation;
- All Business Units shall avoid business disruption arising from loss incidents and protect the profitability of the Company;
- All Business Units shall strive to maintain a safe and healthy work environment for all employees and visitors to Company premises;
- All Business Units shall maintain a secure work environment and minimize losses arising from damage to Company property (e.g., by fire);
- All Business Units shall protect the reputation of Luxfer;
- All Business Units shall encourage employees and all businesses to work together as a team to manage risk and utilize all resources and skills available within the Company, wherever they are located;
- All Business Units shall minimize business disruption that would impact the quality of our customer service;
- All Business Units shall minimize costs associated with liabilities to the general public and other third parties; and
- All Business Units shall minimize the total cost of risk to the Company by risk control or risk transfer.

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**Alok Maskara**  
Chief Executive Officer

<sup>1</sup> This Policy covers all entities and businesses under the control of Luxfer Holdings PLC, including joint ventures with a controlling interest of 51% or greater. All Luxfer employees are responsible for understanding, promoting, and implementing this Policy, as well as complying with the principles set forth herein.