



LUXFER
EQUAL OPPORTUNITY, NON-DISCRIMINATION
AND ANTI-HARASSMENT POLICY

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TABLE OF CONTENTS

	<u>PAGE</u>
1.0 <u>Policy Statement</u>	3
2.0 <u>Purpose</u>	3
3.0 <u>Scope</u>	3
4.0 <u>Protected Characteristics</u>	3
5.0 <u>Equal Opportunity</u>	3
6.0 <u>Non-Discrimination</u>	4
7.0 <u>Anti-Harassment</u>	4
8.0 <u>Sexual Harassment</u>	4
9.0 <u>Diversity and Inclusion Practices</u>	4
10.0 <u>Reporting</u>	5
11.0 <u>Responsibility for this Policy</u>	5

1.0 POLICY STATEMENT

Luxfer Holdings PLC (“Luxfer” or the “Company”)¹ strives to create and maintain a work environment in which people are treated with dignity, decency, and respect. Luxfer is an equal opportunity employer, and we believe that professional conduct furthers the Company’s mission, promotes productivity, minimizes disputes, and enhances our reputation. At Luxfer, the work environment should be characterized by mutual trust and the absence of intimidation, oppression, and exploitation. Luxfer does not tolerate unlawful discrimination or harassment related to any legally protected characteristic or that otherwise violates this Policy.

2.0 PURPOSE

This Policy is designed to set forth Luxfer’s approach to equal opportunity, non-discrimination, and anti-harassment in the workplace and in work-related situations. It sets standards and expectations for appropriate business conduct and acceptable behavior for persons associated with Luxfer. This Policy should be read together with Luxfer’s Code of Ethics and Business Conduct, Human Rights and Labor Practices Policy, and Third Party Code of Conduct, which apply to the entire Luxfer organization and those with whom Luxfer conducts business. The prohibitions contained in this Policy are intended to complement and enhance the above-mentioned policies, not to form the basis of an exception to them.

3.0 SCOPE

This Policy applies to all directors, officers, employees, and workers of Luxfer (“employees” or “personnel”), including any part-time, fixed-term and temporary workers; independent contractors; interns; volunteers; or any other persons involved in the operations of the Company. This Policy applies to all terms of employment, including recruitment, compensation, benefits, training, promotion, discipline, termination, and retirement. Moreover, this Policy applies in any dealings with clients, customers, suppliers, vendors, visitors, or other work-related contacts. Any conduct prohibited by this Policy is unacceptable in the workplace and in work-related settings, such as during business trips, business meetings, and business-related social events.

4.0 PROTECTED CHARACTERISTICS

It is a violation of this Policy for any Luxfer personnel to discriminate or harass an individual on the basis of age, race, color, creed, gender (including gender identity, gender expression, and gender reassignment), religion (including all aspects of religious belief, observance, or practice, such as religious dress or grooming practices), marital status, civil partnership status, pregnancy or maternity, national origin or ancestry, physical or mental disability, medical condition, genetic information, sex, sexual orientation, military or veteran status, or any characteristic protected by law (“Protected Characteristics”).

5.0 EQUAL OPPORTUNITY

Luxfer is an equal opportunity employer and is committed to providing employment opportunities without regard to Protected Characteristics. We seek to maintain a highly productive organization of individuals who (i) represent differences in viewpoints, cultures, and experiences and (ii) embrace unique ideas produced by such diversity. At Luxfer, employment decisions are based solely on merit, qualifications, and abilities. In making employment decisions, the Company measures candidates

¹ 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 personnel and associated parties are responsible for understanding, promoting, and implementing this Policy, as well as complying with the principles set forth herein.

against objective criteria which are designed to avoid discrimination. Specifically, the Company acts in accordance with the following principles when making employment decisions: (i) shortlisting is to be completed by more than one person whenever possible; (ii) vacancies are to be advertised to a diverse section of the labor market, and advertisements shall avoid using language that may discourage particular groups from applying; (iii) job candidates are not to be asked questions which might suggest an intention to discriminate on the grounds of any Protected Characteristic during the interview process or at any time during employment; and (iv) job candidates are not to be asked about health or disability before a job offer is made, except in very limited circumstances allowed by law (e.g. to check that the candidate could perform an intrinsic part of the job, taking in to account any reasonable accommodation). By making employment decisions in accordance with such principles, Luxfer is committed to providing employment and advancement opportunities, compensation, and benefits without discrimination.

6.0 NON-DISCRIMINATION

Luxfer is dedicated to providing a work environment where all persons can work together safely and productively, free from unlawful discrimination. Any act of unlawful discrimination in the workplace or in work-related settings on the basis of any Protected Characteristic is strictly prohibited. Furthermore, Luxfer prohibits (i) any form of discrimination in the provision of employment opportunities, benefits, or privileges; (ii) discriminatory work conditions and behaviors; and (iii) the use of discriminatory evaluative standards in employment. Conditions of service, benefits (including pay, bonus criteria, and all other benefits offered by Luxfer), and facilities will be regularly reviewed to ensure that (i) they are provided on a non-discriminatory basis; (ii) they are available to all personnel who should have access to them; and (iii) there are no unlawful barriers to their access. Luxfer expects all personnel to share in its commitment to equal opportunity and non-discriminatory employment.

7.0 ANTI-HARASSMENT

Luxfer prohibits all forms of harassment. Luxfer personnel have the responsibility to avoid any act or actions, implied or explicit, that may suggest any form of harassment to any other person in the workplace or in a work-related setting.

For purposes of this Policy, harassment is defined as unwelcome verbal, written, physical, or non-physical conduct that denigrates or shows hostility or aversion toward an individual and that (i) relates to any actual or perceived Protected Characteristic; (ii) has the purpose or effect of creating an intimidating, hostile, or offensive work environment; (iii) has the purpose or effect of unreasonably interfering with an individual's work performance; or (iv) otherwise adversely affects an individual's employment opportunities.

8.0 SEXUAL HARASSMENT

Luxfer prohibits all forms of sexual harassment. For purposes of this Policy, sexual harassment is defined as unwelcome behavior of a sexual nature. Sexual harassment includes, but is not limited to, unwanted physical contact, verbal or written remarks of a sexual nature, written or graphic material of a sexual nature, and disparate or preferential treatment due to an individual's sex.

9.0 DIVERSITY AND INCLUSION PRACTICES

Luxfer is committed to fostering, cultivating, and preserving a culture of diversity, equity, and inclusion. The collective sum of the individual differences, life experiences, knowledge, inventiveness, self-expression, and unique capabilities that our employees invest in their work represents a significant part of Luxfer's culture, reputation, and achievement. Luxfer's diversity initiatives are applicable, but not limited, to our practices and policies on recruitment and selection, including

targeted sourcing of employees from diverse backgrounds; compensation and benefits; professional development and training; advancement opportunities; and the ongoing development of a work environment built on the premise of gender and diversity equity that encourages and enforces:

- Respectful communication and cooperation between all personnel;
- Teamwork and employee participation, permitting the representation of all groups and employee perspectives; and
- Company and employee contributions to the communities we serve to promote a greater understanding and respect for diversity.

All Luxfer personnel are expected to exhibit conduct that reflects inclusion during work and in work-related settings. Moreover, all Luxfer personnel are required to complete a variety of anti-harassment, non-discrimination, and unconscious bias trainings annually to ensure effective teamwork and achievement of common business goals. Luxfer's talent acquisition teams and hiring managers undergo additional training to ensure that a diverse slate of candidates is considered for all job openings. Further, Luxfer monitors the composition of its current workforce for diversity, age, and gender demographics. The quality of this data is continually improved to ensure that a diverse and talented workforce is maintained. The Company uses this data to enhance its employment and recruitment practices to provide the most inclusive work environment possible. Diversity data is disclosed in line with best practices and as required by law.

Luxfer is dedicated to upholding these practices in order to empower personnel and foster respect, inclusion, and belonging across the Company. Luxfer is committed to further improving and enhancing its diversity and inclusion practices so that it can better respond to the evolving needs of its workforce and business.

10.0 REPORTING

Employees and interested parties may report any concerns regarding known or suspected violations of this Policy through the regular procedures established by the Company, including contacting their supervisor or local Human Resources Department. You may also report any serious violations anonymously via Luxfer's whistleblowing hotline at +1-866-901-3295 in the U.S., 0800-915-1571 in the U.K., or online at www.safecall.co.uk/report.

The Company will take appropriate and immediate action in response to complaints or knowledge of violations of this Policy. All complaints and investigations are treated confidentially to the extent possible, and information is disclosed strictly on a need-to-know basis. The Human Resources Department will take adequate steps to ensure that the complainant is protected against retaliation during and after the investigation. All information pertaining to a complaint or investigation under this Policy will be maintained securely.

No retaliation or hardship, loss of benefits, nor penalty may be imposed on any personnel as punishment for filing a good faith complaint of discrimination or harassment or responding to a complaint of discrimination or harassment. Anyone engaging in retaliation or attempted retaliation may be subject to discipline, up to and including termination.

11.0 RESPONSIBILITY FOR THIS POLICY

It is the responsibility of the Chief Executive Officer and the Executive Leadership Team to implement, oversee, and monitor the effectiveness of this Policy. This Policy shall be reviewed periodically and revised as necessary to account for changes in circumstances and/or legal or regulatory requirements.

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LAST REVIEW DATE	November 16, 2020
NEXT REVIEW DATE	November 16, 2021
STANDARD CONTACT	Megan Glise, General Counsel