



**LUXFER  
MODERN SLAVERY ACT AND HUMAN RIGHTS  
POLICY STATEMENT**

Version 3.0  
Effective Date: March 5, 2020

## MODERN SLAVERY ACT AND HUMAN RIGHTS STATEMENT

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## **1.0 POLICY STATEMENT**

This Policy Statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and the United Nations Universal Declaration of Human Rights. It sets out the steps taken by Luxfer and its subsidiaries (collectively “Luxfer”), for financial year ended December 31, 2019, to ensure that slavery and human trafficking is not ongoing within any of Luxfer’s businesses or supply chains and that human rights are respected throughout every area of Luxfer.

## **2.0 INTRODUCTION**

Luxfer is committed to ensuring that its organisational culture respects dignity, human rights, and personal recognition. Luxfer is aware that modern slavery takes various forms, including slavery, servitude, forced labour, child labour, and human trafficking, and that it is a global and growing issue. Luxfer has a zero-tolerance approach to modern slavery and is committed to acting ethically, in line with human rights, and with integrity in all of its business dealings and relationships. Luxfer encourages all stakeholders in its businesses to bring to Luxfer’s attention issues or grievances relating to any potential human rights concerns.

## **3.0 ORGANISATIONAL STRUCTURE**

Luxfer is a global materials technology company, specialising in the design, manufacture, and supply of high-performance materials, components, and high-pressure gas-containment devices for healthcare, environmental, protection, and speciality end-markets. Headquartered in Manchester, U.K., Luxfer has a global presence employing over 1,600 staff and operating from sixteen manufacturing plants based in four countries. In 2019, Luxfer’s total revenue was approximately \$443 million.

Luxfer is organised into the following five business units:

- Luxfer Gas Cylinders;
- Luxfer Graphic Arts;
- Luxfer Magtech;
- Luxfer MEL Technologies; and
- Luxfer Superform.

## **4.0 EMPLOYEES**

Luxfer promotes fair reward, diversity and inclusion, equal opportunities, and other human rights through interactions, recruitment practices, hiring decisions, remuneration, training, and promotion. Any form of discrimination based on gender, sexual orientation, gender identity, marital status, family status, creed, colour, race, religion, age, ethnic origin, nationality, union status, or disability is explicitly prohibited.

## **5.0 SUPPLY CHAIN**

Luxfer has a very broad-based and complex supply chain, which includes the sourcing of primary magnesium, aluminium log and alloys, zirconium sand, rare earth metals, carbon fibre, and other speciality chemical compounds and intermediaries. Luxfer is aware that multiple risks accompany such a complex supply chain, including the possibility that human rights may be overlooked and modern slavery may be taking place. However, Luxfer uses a due diligence process to evaluate suppliers and require such suppliers to qualify their governance procedures and commit to our Code of Ethics and Business Conduct.

## **6.0 DUE DILIGENCE AND AUDIT OF SUPPLIERS**

Businesses within Luxfer operate a supplier selection process and have considerable knowledge and understanding of many of their major suppliers, with whom they have a close, long standing business relationship. While Luxfer sources a significant portion of its material and services from European and North American based suppliers, it is acknowledged that some of the goods and services that are purchased, and the countries from which they are sourced, may carry a greater risk.

As part of Luxfer's ongoing commitment to identify and mitigate the risk of modern slavery and possible breaches in human rights in its supply chains, the following steps will continue to be undertaken:

- audits of new and existing suppliers and manufacturing sites by Luxfer employees;
- contractual terms with suppliers that include prohibitions on modern slavery; and
- continued protection of whistleblowers in accordance with the Luxfer Whistleblowing Policies.

In order to ensure the adequacy of the actions being undertaken by Luxfer, there has been an audit of the procurement strategy for each business unit and the implementation of a company-wide process specifically centred around taking steps to ensure Luxfer suppliers are compliant with expected ethical and business standards.

In undertaking these audits, examples of best practice have been highlighted and communicated throughout Luxfer to encourage the continual improvement of standards. Luxfer's encouraged processes and procedures include regular audits of supplier sites to ensure compliance with legal requirements and ethical standards reported, as well as outlining any areas for improvement.

Due diligence is an ongoing process, and Luxfer will continue to review supplier's practices and policies, as well as Luxfer's own policies, to ensure the future commitment of Luxfer and its suppliers to human rights and ethical standards.

## **7.0 GOVERNANCE**

Luxfer has a set of policies that support the delivery of our commitment to human rights and the prevention of modern slavery. Luxfer's internal policies include the following:

- a Code of Ethics and Business Conduct, which sets out Luxfer's principles, requirements, and expectations in relation to the protection of human rights in all areas of its business; and
- Whistleblowing Policies aimed principally at Luxfer employees but also available to others working in the Luxfer supply chains, which encourage the reporting of any wrongdoing that potentially involves human rights violations, including modern slavery. All reports will be fully investigated and remedial actions taken as appropriate.

## **8.0 TRAINING**

Luxfer will continue to provide appropriate training to its employees to ensure a high level of awareness and understanding of the risks and implications of modern slavery and the importance of upholding human rights in all areas of its business, including its supply chains.

STANDARD GOVERNANCE	
STANDARD PRACTICE APPROVALS	Luxfer Holdings PLC Board of Directors
VERSION	3.0
EFFECTIVE DATE	March 5, 2020
LAST REVIEW DATE	March 4, 2020
NEXT REVIEW DATE	March 4, 2021
STANDARD CONTACT	Megan R. Birtwistle – Assistant Company Secretary