

# LUXFER HOLDINGS PLC

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UK Modern Slavery Act Statement  
for Fiscal Year 2020



LUXFER

# UK MODERN SLAVERY ACT STATEMENT FOR FISCAL YEAR 2020

The UK Modern Slavery Act of 2015 (the “Act”) requires certain organizations that conduct business in the United Kingdom to publish an annual statement regarding modern slavery. Such a statement must lay out the steps such organization has taken during the preceding financial year to ensure that slavery and human trafficking are not occurring within the business or in its supply chain. This statement is intended to address these requirements on behalf of Luxfer Holdings PLC and any of its subsidiaries or affiliates (together “Luxfer”) that are covered by the Act for the year ended 31 December 2020.

## WHAT IS MODERN SLAVERY?

Modern Slavery is a term used in the Act to refer to a crime that includes (i) “slavery, servitude and forced or compulsory labor,” and (ii) “human trafficking,” the offenses for which are set out in Section 1 and 2 of the Act. Modern slavery is the severe exploitation of other people for personal and commercial gain. It comes in a variety of forms including human trafficking, forced labor, child labor, and bonded labor, among others. While the practice is universally illegal, an estimated 40 million people worldwide are trapped in modern slavery.<sup>1</sup>

## OUR COMMITMENT

Luxfer is committed to respecting and safeguarding internationally recognized human rights standards, as set forth in the UN Guiding Principles for Business and Human Rights, International Bill of Human Rights, and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work. We embrace these principals in all areas of our business, including our supply chain, and ensure that our organization and those with whom we do business respect human dignity, freedom, and fundamental human rights for all.

## OUR BUSINESS

Luxfer is a global producer of highly-engineered industrial materials, specializing in the design and manufacture of high-performance products for transportation, defense and emergency response, healthcare, and general industrial applications.

In 2012, Luxfer became a publicly traded company on the New York Stock Exchange (NYSE: LXFR). We transitioned from a foreign private issuer to a US domestic issuer in 2019. We employ approximately 1,400 people globally and operate 10 manufacturing plants in the UK, the US, Canada and China. Our principal executive office is located in Manchester, United Kingdom. Our total annual revenue for 2020 was greater than US \$300 million. As such, we fall within the scope for reporting under the Act.

<sup>1</sup> Anti-Slavery International, a UK Registered Charity. (2021). *What is Modern Slavery?*. Retrieved 26 January 2021 from <https://www.antislavery.org/slavery-today/modern-slavery/>

For additional information about Luxfer, we invite you to download our [Annual Reports](#) and view our [filings](#) with the United States Securities and Exchange Commission which are available on our website at [www.luxfer.com](http://www.luxfer.com).

## POLICIES, PRINCIPLES AND GUIDELINES

Since inception, Luxfer has endeavored to deliver superior value to customers through our broad array of technical know-how and proprietary materials technology, targeting innovation and excellence in everything that we do. Integral to this success is the commitment of our employees to uphold our values and conduct business in an ethical manner.

To ensure that we fulfil our commitment to excellence and integrity, all Luxfer employees must comply with our [Code of Ethics and Business Conduct](#), which explicitly forbids the use of forced or involuntary labor in any of our locations and in the operation of facilities with whom we conduct business. The Code summarizes the values, principles, and business practices that guide the business conduct of the Company and sets forth the minimum ethical requirements expected of all Luxfer personnel. Violation of our Code of Ethics and Business Conduct may result in disciplinary action, up to and including termination of employment.

At Luxfer, it is every employee's responsibility to maintain a work environment that (i) reflects respect for fundamental human rights and health and safety standards and (ii) is free from discrimination and harassment. Our [Human Rights and Labor Practices Policy](#) applies to the entire Luxfer organization and demonstrates our commitment to operating in compliance with the standards set forth therein. We continuously endeavor to achieve full compliance with such standards within all facilities throughout our organization and our value chain.

Luxfer believes that honest and transparent business conduct is vital to our reputation and success as a company. Our reputation for integrity is based not only on our own conduct, but also on the actions of those with whom we do business. At a minimum, we are required to comply with applicable laws that govern human rights, labor standards, and health and safety standards. Therefore, we expect our suppliers, distributors, and any third party with whom we do business to comply with our [Third Party Code of Conduct](#); uphold these standards; and ensure that their employees, contractors, and suppliers are familiar and comply with this Code. Luxfer will not do business with any third parties who do not fulfil the requirements set forth by our policies or applicable laws.

Through adherence to these policies and the application of learned skills, we have adopted sound human rights practices to ensure that employees and others in our supply chain are treated with the dignity and respect they deserve, allowing us to conduct business in a safe and healthy environment for all.

## DUE DILLIGENCE AND RISK MANAGEMENT

Luxfer has a complex, global supply chain. We understand that such complexity comes with certain risks – namely, the risk that potential suppliers could conduct their business in an unlawful or unethical manner. While we source a significant portion of our materials from European and North American suppliers, it is understood that some goods and services we purchase and the countries from which they are sourced may carry a greater risk.

As such, we remain vigilant of the third parties with whom we do business. Luxfer operates an extensive supplier selection process and has considerable knowledge and understanding of our major suppliers with whom we have a close and long-standing business relationship. Success in this realm starts in our purchasing department, where our buyers are regularly trained on the supplier standards covering human rights, labor rights, and working conditions. These objectives are integrated into our buyers' performance reviews, which also incentivizes the identification of risks in our supply chain.

Moreover, we conduct thorough examinations of new and existing third parties, contractors, suppliers, agents, and service providers on a regular and ongoing basis. We utilize several different methods to achieve this, including conducting supplier risk assessments and both on- and off- site audits. Pursuant to our Third Party Code of Conduct, we require that third parties allow representatives from Luxfer and, if requested, Luxfer's customers full access to their production facilities, records, and workers for confidential review and interviews. We use appropriate due diligence procedures to properly vet our third party business associates prior to entering into any agreements, and we reject parties who do not fulfil our requirements or meet our standards.

## COMPLIANCE AND TRAINING

Luxfer's potential and actual impacts on human rights are assessed on a regular basis. We benchmark ourselves against external indices, namely Institutional Shareholder Services (ISS) Environmental, Social and Governance (ESG) ratings, to ensure that our approach is in line with industry best practice. In 2020, Luxfer's ISS rating under the "Social" category, which includes an assessment of our labor and human rights practices, improved to the best possible score under their system. We have also obtained ISO 45001/OHSAS 18001 certification for our labor and human rights management system, which covers up to 40% of our current operations.

To ensure company-wide compliance with these standards and policies, our employees undergo extensive training annually on a variety of topics, including our Code of Ethics and Business Conduct, human trafficking, and other labor standards. Employees are required to certify in writing that they have (i) read the Code and other applicable policies, (ii) understand their responsibilities under the Code and such policies, and (iii) agree to comply the Code and such policies. Completion of training and certifications are tracked by the Company.

## REPORTING

Luxfer highly encourages reporting of any wrongdoing regarding human rights and requests that employees and stakeholders bring to light any issues or grievances relating to any potential human rights concerns. Interested parties may report any violations anonymously via Luxfer's whistleblowing hotline at +1-866-901-3295 or online at [www.safecall.co.uk/report](http://www.safecall.co.uk/report). Our whistleblowing hotline is available for use by Luxfer employees and anyone within our supply chain. It offers an anonymous means of reporting any concerns 24/7 and has multi-lingual support for reporters in more than 170 languages.

Luxfer's longstanding [Whistleblowing Policy](#) protects our employees and others working in our supply chain. It describes the procedures in place to ensure that all reports are thoroughly investigated and appropriate actions are taken. Our policy includes strong protections against retaliation for whistleblowing, further encouraging those who see something to say something.

## APPROVAL

This statement under Section 54 of the UK Modern Slavery Act 2015 has been approved by the Board of Directors for Luxfer Holdings PLC for the fiscal year ended 31 December 2020.



**Alok Maskara**  
Chief Executive Officer  
Luxfer Holdings PLC

3 March 2021