

Luxfer Holdings PLC (“Luxfer” or the “Company”) <sup>1</sup> is committed to respecting the human rights of all individuals throughout our operations and value chain. This Human Rights and Labor Practices Policy (“Policy”) embraces the key principles set forth in the UN Guiding Principles for Business and Human Rights, International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights), the OECD Guidelines for Multinational Enterprises, and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work.

This Policy applies to all employees of Luxfer, including part-time and temporary workers, as well as independent contractors. This Policy is designed to be used as a framework for Luxfer’s global labor practices and should be read together with Luxfer’s Code of Ethics and Business Conduct; Equal Opportunity, Non-Discrimination and Anti-Harassment Policy; and Third Party Code of Conduct, which apply to the entire Luxfer organization and those with whom Luxfer conducts business, including our partners, suppliers, and vendors. It is Luxfer’s policy that where local law and international human rights standards differ, we will follow the higher standard, and where they are in conflict, we will adhere to local law, while seeking ways to respect international human rights to the greatest extent possible.

## 1.0 OUR LABOR PRACTICES

Luxfer is committed to operating in compliance with the standards set forth herein and endeavors to achieve full compliance with such standards within all facilities throughout our value chain.

- (A) ***Fair and Humane Treatment.*** Luxfer is committed to treating all workers fairly and with respect and dignity. No worker is to be subject to any physical, sexual, psychological, or verbal harassment or abuse; nor is there to be a threat of any such treatment.
  
- (B) ***Equal Opportunity; Non-Discrimination; Anti-Harassment.*** At Luxfer, we value and advance the diversity and inclusion of the individuals with whom we work. We are committed to providing equal opportunities and are intolerant of discrimination and harassment. We endeavor to maintain workplaces that are free from discrimination or harassment 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, including the rights of minority groups and women. All terms of employment – including hiring, payment, benefits, training, promotion, termination, and retirement – are to be based on objective criteria, including an individual’s performance, qualifications, and ability to do the job. We do not tolerate disrespectful or inappropriate behavior, harassment, unfair treatment, or retaliation of any kind within the workplace or in any work-related setting.
  
- (C) ***Forced Labor and Human Trafficking.*** We prohibit the use of all forms of forced labor, including indentured, bonded, slave, or prison labor. All work shall be performed on a voluntary basis, and workers shall be free to terminate their work upon reasonable notice in accordance with the terms of

---

<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 and contractors are responsible for understanding, promoting, and implementing this Policy, as well as complying with the principles set forth herein.

their labor contract, as applicable. Luxfer shall not use, condone, nor participate in any form of slavery or human trafficking. Recruiting, hiring, transporting, or obtaining persons by means of threat, force, coercion, fraud, or other means for the purpose of exploitation is prohibited. There shall be no unreasonable restrictions on workers' freedom of movement within Luxfer's facilities. Unless required by law, workers' original identification documents, travel documents, or any other personal documents or valuables shall not be surrendered upon hiring, during employment, or during the recruitment process. Workers shall not be required to pay any recruitment fees or other fees or deposits in order to gain employment.

- (D) **Child Labor.** Luxfer prohibits the use of child labor, and we ensure compliance with local laws regarding the minimum age of workers. In addition, Luxfer ensures compliance with all legal requirements for the work of authorized young workers, particularly those pertaining to hours of work, wages, working conditions, and the handling of certain materials.
- (E) **Wages and Benefits.** Luxfer is committed to implementing a fair policy of employment and compensation in compliance with applicable laws, regulations, and rules. We agree to pay workers at least the minimum compensation required by local law and provide all legally mandated benefits. In addition to payment for regular hours of work, workers shall be paid for overtime hours at such premium rate as is legally required or, in those countries where such laws do not exist, at a rate equal to their regular hourly pay. Deductions from wages as a disciplinary measure are not permitted.
- (F) **Working Hours.** We ensure that on a regularly scheduled basis, except in emergency or extraordinary business circumstances, workers are not required to work more than (i) sixty (60) hours per week, including overtime or (ii) the limits on regular and overtime hours required by the law in the jurisdiction in which the Company operates. Furthermore, except in emergency or extraordinary business circumstances, all workers are entitled to at least one (1) day off in every seven (7) day period.
- (G) **Freedom of Association.** In conformance with local law, we respect the right of workers to exercise lawful rights of free association, including joining or refraining from joining any worker association and collective bargaining, without fear of reprisal, intimidation, or harassment. Where workers are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely-chosen representatives.
- (H) **Health and Safety.** The health and safety of our employees is of paramount importance. Our policy is to provide workers with a clean, safe, and healthy work environment in compliance with all legally mandated standards for workplace health and safety in the jurisdictions in which we operate. This requirement includes any residential facilities the Company may provide to its workers. We work to provide and maintain a safe, healthy, and productive workplace, in consultation with our employees, by addressing and remediating identified risks relating to accidents, injuries, and health concerns.
- (I) **Privacy.** We recognize the importance of privacy and security in an individual's life. We are committed to complying with all relevant data protection laws, including, where applicable, the EU General Data Protection Regulation 2016/679 and the U.K. Data Protection Act 2018. We are committed to respecting the privacy of Luxfer employees, customers, suppliers, and other third parties, and agree to take all reasonable and appropriate steps to safeguard personal information provided pursuant to such business relationship.

## **2.0 TRAINING AND THIRD-PARTY DUE DILIGENCE**

Employee training is essential to ensuring effective implementation of this Policy. To that end, all Luxfer personnel are required to complete mandatory compliance training on human rights, labor practices, and human trafficking at least once annually through Luxfer’s online compliance training platform. These training modules equip employees with the knowledge they need to identify, combat, and prevent human rights violations.

Realizing that the importance of upholding human rights extends to our supply chain, all Luxfer employees also receive training on other applicable Company policies, such as our Code of Ethics and Business Conduct and our Third Party Code of Conduct, throughout the year. Those employees who work directly with our suppliers and distributors, such as buyers and those in our purchasing departments, receive additional training on the supplier standards covering human rights, labor rights, and working conditions. Moreover, these environmental and social objectives are integrated into our buyers’ performance reviews, further solidifying our commitment to upholding human rights throughout our supply chain.

Furthermore, Luxfer’s suppliers, distributors, agents, customers, and all other third parties with whom we work (“Third Party Representatives”) are required to comply with the Company’s Third Party Code of Conduct. The Third Party Code of Conduct incorporates the human rights and labor standards set forth in this Policy, and Third Party Representatives are responsible for ensuring their employees, agents, and subcontractors working on Luxfer business understand and comply with the Third Party Code of Conduct. Luxfer carries out regular due diligence to ensure its Third Party Representatives meet or exceed the standards set forth in this Policy.

## **3.0 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](http://www.safecall.co.uk/report).

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 and Legal Department will take adequate steps to ensure that the complainant is protected from retaliation during and after the investigation. All information pertaining to a complaint or investigation under this Policy will be maintained securely.

## **4.0 CONFLICT MINERALS**

Rule 13p-1 under the Securities Exchange Act of 1934 requires companies to file a specialized disclosure report if it manufactures or contracts to manufacture products containing certain minerals. Luxfer takes seriously its reporting responsibilities under Rule 13p-1 and the Dodd-Frank Wall Street Reform and Consumer Protection Act, as well as our due diligence requirements under the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. We understand that (i) these minerals have been linked with human rights violations in the Democratic Republic of Congo and other conflict zones and (ii) there is a risk that these minerals may enter our supply chain.

In fulfillment of our due diligence requirements for tracing and sourcing, Luxfer's Third Party Code of Conduct contains standards regarding conflict-free mineral sourcing, which our Third Party Representatives are required to follow. Specifically, Third Party Representatives must establish management policies and procedures to actively trace materials used to ensure that such materials do not contain conflict materials. Additionally, Luxfer regularly requires declarations from its Third Party Representatives, verifying that materials supplied to the Company are from conflict-free sources and listing mineral sources for traceability (including supplier, mine name, and location). Moreover, Luxfer undertakes a formal review of all products at least once annually. If it is determined that any materials used to manufacture Luxfer products contain quantities of 3TG and/or materials containing 3TG, Luxfer requires its suppliers to complete, in good faith, conflict mineral-related questionnaires inquiring about the material's country of origin and the country of origin of any materials recycled from scrap sources. Had any of our suppliers been non-responsive to the questionnaire or if any supplier indicated that the material originated from a covered country, Luxfer has appropriate procedures in place to cease doing business with such suppliers and notify affected parties immediately.

Our disclosure on conflict minerals is published once annually and can be found on our website at <https://www.luxfer.com/investors/sec-filings/>.

## **5.0 STAKEHOLDER AND PUBLIC ENGAGEMENT**

Stakeholder and public engagement are essential to maintaining our strong corporate governance practices. Luxfer is committed to stakeholder involvement in the development, implementation, and the evaluation of this Policy. We welcome feedback and input through our website at [www.luxfer.com/contact/](http://www.luxfer.com/contact/) or by emailing us at [investor.relations@luxfer.com](mailto:investor.relations@luxfer.com). Stakeholders or other interested parties may also contact us by sending a letter to c/o Company Secretary, Luxfer Holdings PLC, 8989 North Port Washington Road, Suite 211, Milwaukee, WI, 53217.

## **6.0 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.