



**LUXFER**

**U.K. MODERN SLAVERY  
ACT STATEMENT**

For Fiscal Year 2021

# U.K. MODERN SLAVERY ACT STATEMENT FOR FISCAL YEAR 2021

This statement has been published in accordance with the U.K. Modern Slavery Act of 2015 (the “Act”). It sets forth the steps taken by Luxfer Holdings PLC, including its subsidiaries and affiliates covered by the Act (together “Luxfer” or the “Company”)<sup>1</sup>, to prevent modern slavery and human trafficking in its business and supply chains during the year ending 31 December 2021.

## INTRODUCTION

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This is the sixth-annual Modern Slavery Statement issued by Luxfer under the Act. It outlines the steps we have taken, and continue to take, to prevent modern slavery and human trafficking in our operations, and within our supply chain, in the last fiscal year.

Luxfer is deeply conscious of the global implications of modern slavery, and we understand that we have a responsibility to prevent, mitigate, and remediate where necessary, the risks of human trafficking; slavery; and forced, bonded, and child labor. We remain committed to respecting internationally recognized human rights standards, as set forth in the UN Guiding Principles for Business and Human Rights, the International Bill of Rights, the OECD Guidelines for Multinational Enterprises, and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work. To fulfil our commitments under these standards and to our stakeholders, we will continually review and improve our policies, practices, and procedures in all areas of our business to ensure that our Company and those with whom we do business respect human dignity, freedom, and fundamental human rights for all.

## ABOUT US

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Luxfer is a global industrial company innovating niche applications in materials engineering. Using our broad array of proprietary technologies, we focus on value creation, customer satisfaction, and demanding applications where technical know-how and manufacturing expertise combine to deliver a superior product. We specialize in the design and manufacture of high-performance products for transportation, defense and emergency response, healthcare, and general industrial applications.

Luxfer is listed on the New York Stock Exchange and our ordinary shares trade under the symbol LXFR. Our principal executive office is located in Milwaukee, Wisconsin, U.S. We employ approximately 1,300 people globally and operate 10 manufacturing plants in the U.K., the U.S., Canada, and China. Our total annual revenue in 2021 was greater than £36 million. As such, we fall within the scope for reporting under the Act.

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<sup>1</sup> This statement covers all entities and businesses under the control of Luxfer Holdings PLC, including joint ventures with a controlling interest of 51% or greater.

## POLICIES, PRINCIPLES, AND GUIDELINES

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Since inception, Luxfer has endeavored to deliver superior value to customers by targeting innovation and excellence in everything we do. Integral to our success is the commitment of our employees to uphold our values and conduct business in an honest and ethical manner.

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

Likewise, Luxfer employees are aware of their 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 realize that our reputation for integrity is based not only on our own conduct, but also the conduct 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, agents, service providers, and all other third parties with whom we work (“Third Party Representatives”) 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. Based on our own Code of Ethics and Business Conduct, the Third Party Code of Conduct applies to all Third Party Representatives worldwide. Under the Code, Third Party Representatives are expected to respect, acknowledge, uphold, and comply with the following key themes and extend these standards to their own supply chain:

- Employee health, safety, and fair working conditions;
- Prohibition of forced labor, child labor, and human trafficking;
- Business ethics, anti-corruption, and anti-bribery;
- Data privacy;
- Environmental responsibility;
- Conflict-free mineral sourcing; and
- Product service and quality.

Through adherence to these policies and the application of learned skills, we have adopted sound human rights practices to ensure that our employees and those in our supply chain are treated with the dignity and respect they deserve.

## COMPLIANCE AND TRAINING

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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 Rights and Labor Practices Policy, health and safety, and identifying human trafficking, among others. In 2021, we required that all employees certify in writing that they have (i) read the Code of Ethics and Business Conduct and other applicable policies, (ii) understand their responsibilities under the Code of Ethics and Business Conduct and such policies, and (iii) agree to comply with the Code of Ethics and Business Conduct and such policies. Completion of trainings and certifications are tracked by the Company.

## DUE DILIGENCE AND RISK MANAGEMENT

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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, Luxfer operates an extensive supplier selection process and has considerable knowledge and understanding of our major suppliers with whom we have close and long-standing business relationships. Success in this realm starts in our purchasing department, where our buyers are regularly trained on the supplier standards covering human rights, labor standards, and working conditions. These objectives are integrated into our buyer's performance reviews to incentivize the identification of risks in our supply chain.

Thorough examinations of new and existing Third Party Representatives are conducted on a regular and ongoing basis. We utilize several different methods to ensure that standards are met, including supplier risk assessments and both on- and off-site audits. Pursuant to the Third Party Code of Conduct, Third Party Representatives are required to 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 vet Third Party Representatives prior to entering into any business arrangement and reject third parties who do not fulfill our requirements or meet our standards.

Beginning in late 2021, the establishment of new commercial contracts and the continuation of existing commercial arrangements with Luxfer require Third Party Representatives to certify, in writing, that they have read, understand, and agree to comply with the Third Party Code of Conduct. To ensure ongoing alignment with these standards, certification must be renewed once every three years. In 2022, we will continue to implement the appropriate internal processes to ensure that all Third Party Representatives have certified Luxfer's Third Party Code of Conduct. In addition, we have begun collecting metrics related to Third Party Representatives, which are recorded quarterly by each Luxfer business unit on our balanced scorecard and are reviewed with the CEO and senior management twice annually. We look forward to further refining our internal processes so that we may extend this requirement to 100% of our suppliers during the 2022 fiscal year.

## CONFLICT MINERALS

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Rule 13p-1 of 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/>.

## BENCHMARKING

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Luxfer’s potential and actual impacts on human rights are assessed on a regular basis. We benchmark our practices against external indices, namely Institutional Shareholder Services (“ISS”) Environmental, Social, and Governance (“ESG”) QualityScore Ratings, to ensure that our approach is in line with industry best practices, established standards, and recognized challenges. In 2021, Luxfer maintained the best possible rating under ISS’ ESG Ratings in the “Social” category, which assesses our human rights, labor, health and safety, supply chain, and ethical sourcing practices.



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<sup>2</sup> ISS Social QualityScore calculated as of January 24, 2022.

## REPORTING

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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 in our supply chain. It offers an anonymous means of reporting concerns 24/7 and has multi-lingual support for reporters in over 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. The Policy includes strong protections against retaliation for whistleblowing, further encouraging those who see something to say something.

## STAKEHOLDER ENGAGEMENT

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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 statement and any supporting company policies. We welcome feedback and input through our website at <https://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, USA, 53217.

## APPROVAL

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This statement under Section 54 of the U.K. Modern Slavery Act 2015 has been approved by the Board of Directors for Luxfer Holdings PLC for the fiscal year ended 31 December 2021.



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

2 March 2022