

Luxfer Holdings PLC (“Luxfer” or the “Company”) ¹ is committed to the protection of the environment; the safe supply of its products; and the health and safety of its employees, contractors, customers, and the public. We conduct our operations with the belief that all Environmental, Health and Safety (“EHS”) incidents are preventable. As such, we regularly (i) identify, assess, and monitor EHS elements relating to our business activities; (ii) implement effective control methods to reduce the impact of such elements on individuals and the environment; (iii) set EHS objectives and report our progress on these objectives in a transparent manner; and (iv) expect our employees to conduct their daily activities in a manner consistent with this Policy.

Luxfer operates an EHS Management System (“EMS”), which is endorsed by the Board of Directors and implemented globally across each of Luxfer’s businesses. Luxfer’s EMS is comprised of various policies, procedures, and objectives, which focus on compliance, footprint reduction, and overall management of EHS performance. Luxfer’s businesses track progress and perform self-audits in accordance with this EMS, with a goal of improving environmental efficiency and actively preventing occupational illnesses and injuries. Luxfer’s EMS includes the following elements:

- Policies that provide a framework for reviewing Luxfer’s EHS objectives;
- Operating procedures to control impacts of EHS elements;
- Processes to identify, report, investigate, and correct non-conformities or deficiencies;
- Documented emergency procedures and plans for responding to known and potential emergency situations that could have an impact on individuals or the environment;
- Action plans to achieve objectives in accordance with Luxfer’s policies;
- Periodic assessments to ensure the effectiveness of the EMS and Luxfer’s progress toward achieving EHS objectives;
- Training to ensure employees have the knowledge and skills necessary to carry out work related to EHS matters; and
- Processes for the communication, retrieval, and retention of EHS information and records.

While Luxfer commits to comply with all applicable governmental regulations, we strive to achieve best industry practices and to continuously improve our EMS and related processes. In order to conduct business in a safe and environmentally friendly manner, Luxfer undertakes to operate its businesses in accordance with the following principles:

Environmental

Luxfer is committed to integrating principles of resource conservation, pollution prevention, and environmental stewardship into its business processes, facilities, operations, and products. Specifically, we are committed to:

- Integrating environmentally sound designs and practices into our products and manufacturing processes;
- Conserving natural resources through careful planning and efficient use of water, energy, and raw materials;
- Minimizing waste through source reduction, re-use, and recycling;
- Handling and disposing of waste through safe and environmentally sustainable methods;
- Preventing pollution, including greenhouse gases and the unintended release of substances that could cause harm to air, water, or land;

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

- Establishing environmental objectives and conducting regular reviews of our performance in reference to these objectives;
- Training and encouraging our employees to conduct their activities in an environmentally responsible and sustainable manner;
- Requiring our contractors, suppliers, customers, and business partners to maintain the same high levels of environmental performance;
- Supporting the environmental initiatives of our contractors, suppliers, customers, and business partners; and
- Complying with all applicable legal requirements in relation to environmental matters.

Health and Safety

Luxfer is committed to maintaining a safe and healthy workplace for employees, contractors, visitors, and all who may be affected by Luxfer’s business activities. Specifically, we are committed to:

- Preventing occupational illnesses and injuries through the continuous improvement of our health and safety management processes;
- Providing and ensuring the use of necessary safety devices and protective equipment;
- Ensuring safety and the absence of risks to health in connection with the use, handling, storage, and transportation of articles and substances, including those that may be flammable or hazardous to health;
- Ensuring that all workplace equipment is suitable for its purpose and properly maintained;
- Providing training, instruction, and information to enable employees to perform their work safely;
- Establishing health and safety objectives and conducting regular reviews of our performance in reference to these objectives;
- Promoting a positive health and safety culture through regular engagement with employees on EHS matters;
- Requiring our contractors, suppliers, customers, and business partners to maintain the same high levels of health and safety performance; and
- Complying with all applicable legal requirements in relation to health and safety matters.

Luxfer is committed to continual improvement in EHS performance and ensuring that the delivery of the EMS is adequately resourced to enable the full implementation of this Policy. This commitment includes the provision of sufficient resources and management and employee time, as well as training and EHS advisory support.

It is the responsibility of the Chief Executive Officer and the Executive Leadership Team to (i) drive the implementation of this Policy; (ii) monitor the implementation of this Policy and the Company’s overall EHS performance; (iii) provide strategic guidance to Luxfer’s business units in relation to this Policy and EHS matters; and (iv) report to the Board of Directors on such matters accordingly. Notwithstanding the foregoing, we believe that all Luxfer employees are responsible and accountable for Luxfer’s overall EHS compliance and performance. The Company is committed to partnering with employees to raise awareness, share information, and enhance accountability for environmental, health and safety protection.

This Policy shall be reviewed periodically and revised as necessary to account for changes in circumstances and/or legal or regulatory requirements.