



**LUXFER**

**UK MODERN SLAVERY  
STATEMENT**

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Fiscal Year 2024

# LUXFER HOLDINGS PLC

## UK MODERN SLAVERY STATEMENT

### FISCAL YEAR 2024

This UK Modern Slavery Statement (this “Statement”) has been published in accordance with the UK Modern Slavery Act 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 2024.

## INTRODUCTION

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 also recognise that our customers, shareholders, and other stakeholders increasingly look to us for visibility into our human rights practices and policies.

Guided by our core values and as stated in our Code of Ethics and Business Conduct, we remain committed to respecting internationally recognised human rights standards, as set forth in the UN Guiding Principles for Business and Human Rights, the International Bill of Rights, the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, the International Labor Organization Declaration on Fundamental Principles and Rights at Work, and the Ten Principles of the United Nations Global Compact. 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 the Company and those with whom we do business respect human dignity, freedom, and fundamental human rights for all.

### 2024 Highlights

- 100% of Luxfer employees attested compliance in writing to corporate policies, including the Code of Ethics and Business Conduct and the Human Rights and Labor Practices Policy, in 2024 (2023: 100%)
- 86.5% of suppliers and distributors with annual business of \$50,000 or more attested compliance in writing to Luxfer’s Third Party Code of Conduct in 2024 (2023: 91.2%)
- Completed annual ESG cross-audits, which include a review of supply chain evaluation processes and risk assessment criteria

### Plans for 2025

- Maintain 100% employee attestation to corporate policies, including those related to human rights, modern slavery, and supply chain responsibility
- Achieve a 100% attestation rate to Luxfer’s Third Party Code of Conduct by Third Parties with annual business of \$50,000 or more, gradually extending this requirement to 100% of our supply chain
- Identify further internal mechanisms and develop processes through which Luxfer can evaluate its first-tier supply chain for modern slavery risk

<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, that carry on business, or part of a business, in the UK, supply goods and/or services, and which have an annual turnover (including turnover of any subsidiary undertakings) of £36 million or more, including Luxfer Gas Cylinders Limited, Luxfer Gas Cylinders China Holdings Limited, Luxfer Group Limited, Luxfer Group 2000 Limited, Luxfer Group Services Limited, Luxfer Overseas Holdings Limited, Magnesium Elektron Limited, BA Holdings, Inc., Luxfer Inc., Structural Composites Industries, LLC, Luxfer Magtech Inc., MEL Chemicals Inc., Reade Manufacturing Company, and Magnesium Elektron North America Inc.

## LUXFER'S BUSINESS

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- Luxfer is a [global industrial company](#) innovating niche applications in materials engineering.
- Luxfer operates three business segments: [Gas Cylinders](#), [Elektron](#) and [Graphic Arts](#).
- We are guided by our values - [Customer First](#), [Integrity](#), [Innovation](#), [Accountability](#), [Personal Development](#), and [Teamwork](#).
- Luxfer is publicly traded on the New York Stock Exchange ([NYSE: LXFR](#)).
- Luxfer Holdings PLC is a public limited company incorporated under the laws of [England and Wales](#) (Company No. 03690830).



For over 125 years, Luxfer has been innovating products that help create a safe, clean, and energy-efficient world. 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. Luxfer's highly engineered products serve in crucial applications, including:

- high-pressure carbon fiber cylinders that hold compressed natural gas and hydrogen, used in clean energy vehicles that reduce emissions;
- lightweight air cylinders carried by firefighters that allow safe breathing in hazardous environments;
- high-performance cylinders used for medical oxygen and specialty gasses;
- magnesium powders used in countermeasure flares for military applications;
- flameless heating technology used in military Meals Ready-to-Eat (MRE) field rations, as well as other civilian emergency preparedness and disaster relief meal kits;
- magnesium alloys used in lightweight components for aerospace and industrial applications that improve efficiency and performance;
- zirconium catalysts that remove toxic substances from the air and drinking water; and
- magnesium plates and photo engraving products used for decorative embossing on book covers, wine labels, and other high-quality printed materials.

As of 31 December 2024, we employed approximately 1,500 people globally, of whom 532 were employed in the UK. Throughout fiscal year 2024, we operated 13 manufacturing plants in the UK, the US, Canada, and China, one of which relates to discontinued operations. Our consolidated total annual revenue in 2024 was \$391.9 million, or roughly £306.5 million. As such, we fall within the scope for reporting under the Act.

## Canada

- Calgary, Alberta

## United Kingdom

- Manchester, England x2
- Nottingham, England

## United States

- Pomona, California
- Riverside, California x2
- Madison, Illinois
- Cincinnati, Ohio
- Saxonburg, Pennsylvania
- Tamaqua, Pennsylvania
- Flemington, New Jersey

## China

- Shanghai



Luxfer's supply chain is global in nature. We source a variety of raw materials and components that are incorporated in the products that Luxfer sells. The largest categories of direct material purchases are aluminum, zirconium, carbon fiber, and magnesium. The Company also purchases products and services to support our business operations, which are used to develop, manufacture, or administer services related to, but not incorporated in, Luxfer's products.

## OUR GOVERNANCE APPROACH

Advancing respect for human rights is a cross-functional responsibility embedded in our strategy and applied locally. Through continued focus on a range of environmental, social and governance (ESG) priorities, including those focused on human rights and supply chain responsibility, we contribute to the creation of a more sustainable world for all.

Luxfer's Board of Directors oversees the Company's strategic direction, including our sustainability initiatives, governance practices, and ESG-related risks and opportunities, to promote long-term growth. The Board oversees a broad range of subjects that make up human rights, such as safety, ethics, responsible business conduct, diversity and inclusion, stakeholder and employee engagement, and supply chain responsibility. Oversight of specific ESG-related matters are delegated to the appropriate Board Committee(s) as deemed necessary by the Board.

The CEO and Executive Leadership Team are responsible for driving the Company's strategy, performance, and managing day-to-day operations. As sustainability continues to be a priority at Luxfer, our strategy includes integrating ESG best practices into our operations and culture to continuously improve and evolve our business practices in response to changing circumstances.

Luxfer's General Counsel sponsors our sustainability initiatives, ensuring they are aligned with our mission and values. Finally, our Sustainability Steering Committee is responsible for operationalizing the Company's sustainability initiatives, carrying out annual ESG Cross-Audits, sharing best practices between Luxfer facilities to improve our ESG performance at the site level, and working with local leadership and colleagues to see projects through to completion.



## OUR COMMITMENT, POLICIES, AND PROCESSES

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Luxfer prohibits modern slavery and human trafficking in every form and makes this statement to set out the steps we have taken to identify and mitigate the risk of modern slavery and human trafficking in all areas of our business.

Our commitment to human rights is grounded in the UN Guiding Principles for Business and Human Rights, the International Bill of Rights, the OECD Guidelines for Multinational Enterprises, the International Labor Organization Declaration on Fundamental Principles and Rights at Work, and the Ten Principles of the United Nations Global Compact. Using the foregoing standards as our foundation, we address modern slavery risks through various global policies; employee training on human rights-related topics; and appropriate due diligence, selection, and assessment activities throughout our supply chain.

### Policies

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 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 or the business relationship.

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](#) embraces key principles set forth in various international declarations, covenants, and guidelines. It should be read together with Luxfer's Code of Ethics and Business Conduct; Equal Opportunity, Non-Discrimination, and Anti-Harassment Policy; and our Third Party Code of Conduct. All policies apply to the entire Luxfer organisation and require compliance with applicable laws and respect for internationally recognised human rights across all our operations globally.

These policies apply equally to those with whom we conduct business, including our suppliers, distributors, contractors, agents, service providers, partners, and customers ("Third Parties"). To ensure that our partners conduct business with a high degree of integrity and in a socially and environmentally responsible manner, all Third Parties are expected to adhere to our [Third Party Code of Conduct](#). Based on our own Code of Ethics and Business Conduct, the Third Party Code of Conduct applies to all Third Parties worldwide. Under the Code, our Third Parties are expected to respect, acknowledge, and uphold standards on the following key themes and extend these standards to their supply chain:

- working conditions;
- employee health and safety;
- prohibition of child labor, forced labor, and human trafficking;
- business ethics, anti-corruption, and anti-bribery;
- data privacy;
- environmental responsibility;
- conflict-free mineral sourcing; and
- product and service quality.

### Training

Identifying, mitigating, and remediating human rights concerns depends on the practical understanding of such matters by our people and business partners. To ensure company-wide compliance with these standards and policies, our employees undergo extensive training annually on a variety of topics, including, but not limited to, our Code of Ethics and Business Conduct, Human Rights and Labor Practices Policy, health and safety, and modern slavery. Employees are required to provide an annual written acknowledgment that they have read, understand, and agree to comply with each policy. Completion of trainings and certifications are tracked by the Company.

Our compliance training utilises a combination of in-person and online learning, including leadership-sponsored staff meetings and site-level trainings. Our online compliance trainings are assigned to employees based on their role and area of responsibility within the Company, with a number of courses considered mandatory, including those related to ethics, integrity, compliance, and human rights.

### Due Diligence, Vendor Selection, and Assessment Procedures

Although Luxfer sources a significant portion of raw 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 greater risks. As such, Luxfer operates a vendor selection process and has considerable knowledge and understanding of our major suppliers with whom we have close and long-standing business relationships. Our purchasing teams are trained annually on the supplier standards covering human rights, labor requirements, and working conditions.

Examinations of new and existing vendors are conducted regularly. We utilise several methods to ensure that our standards are met, including vendor risk assessments and audits. Through this approach, vendor assessments are conducted based on multiple factors (e.g., risk profile, engagement type and activity, and geography). These assessments evaluate the vendor's ability to meet both our internal and industry standards for quality, safety, reliability. Results are reviewed with local management upon completion. Pursuant to our Third Party Code of Conduct, Third Parties are required to allow representatives from Luxfer and, if requested, Luxfer's customers full access to their production facilities, records, and workers. We use appropriate due diligence procedures to vet our Third Parties prior to entering into any business arrangements and reject those who do not fulfill our requirements or meet our standards.

As launched in late 2021, the establishment of new commercial contracts and the continuation of existing commercial arrangements with Luxfer require certain Third Parties to sign and return an acknowledgment form as a means to verify compliance with the Third Party Code of Conduct. To ensure ongoing compliance, Luxfer requests that Third Parties renew their signature on the form once every three years. Presently, attestation to the Third Party Code of Conduct applies only to Third Parties who, on an annual basis, do \$50,000 or more in business with Luxfer. Attestation rates are tracked quarterly by each Luxfer site on our internal ESG Scorecard, which is reviewed twice annually with the CEO and regularly with senior management. In 2025, we will continue to implement and refine internal processes to increase Third Party attestation to Luxfer's Third Party Code of Conduct. We look forward to extending this requirement to 100% of our supply chain in the future.

### Responsible Mineral Sourcing

Rule 13p-1 of the Securities Exchange Act of 1934 requires companies to file a specialised disclosure report if it manufactures or contracts to manufacture products for which certain "conflict minerals" are necessary to the functionality or production of such products. 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 the 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 Parties are required to follow. Specifically, Third Parties must establish management policies and procedures to actively trace materials used to ensure that such materials do not contain conflict materials. Additionally, Luxfer requires declarations from its Third Parties, 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/>.

## RISK ASSESSMENT AND MANAGEMENT

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Principle O of the UK Corporate Governance Code 2018 states that: the Board should establish procedures to manage risk, oversee the internal control framework and determine the nature and extent of the principal risks it is willing to take in order to achieve its long-term strategic objectives.

Our approach to identifying and assessing human rights risks, including modern slavery risks, is embedded within Luxfer's Enterprise Risk Management (ERM) program, which is the Company's overall framework for identifying, assessing, monitoring, and mitigating the Company's most significant risks.

### Roles and Responsibilities

#### **Board of Directors**

- Oversees the management of risks relevant to the Company as part of regular Board and Committee meetings
- Oversight of certain risks is delegated to the appropriate Board Committee with the skills and experience to oversee them

#### **Audit Committee**

- Oversees annual ERM processes, including the annual Risk Assessment and development of the Internal Audit Plan
- Monitors the effectiveness of the risk management systems and report their findings to the Board

#### **Internal Audit Function**

- Oversees the design, implementation, and review of the Risk Framework and Assessment
- Reports directly to the Audit Committee on progress and results of ERM program, including the results of audits and reviews pertaining to supply chain risks and practices

#### **Management Teams**

- Identify key risks for inclusion in the Risk Framework
- Assess each risk in the Risk Framework and determine materiality to business
- Carry out response plans and complete internal audits related to material risks

### Risk Identification

A wide breadth of potential risks relevant to the Company are evaluated under our ERM program, including those related to human rights and supply chain responsibility that could present financial, operational, or strategic risk. Through the ERM program, we apply standard risk management assessments, definitions, and terminology aligned with the Committee of Sponsoring Organizations (COSO) Enterprise Risk Management Framework to each of Luxfer's business units and corporate functions.

### Assessing Risk Significance

Our Risk Framework and Assessments are accompanied by an internal manual to ensure a consistent and methodical assessment of the risks to which the Company is exposed. The manual provides guidance to help quantify the materiality of each risk, including its timing, likelihood, magnitude, scope, and financial impact. Each risk identified in the Risk Framework is reviewed by our Internal Audit team and management. Risks are prioritised based on their relative likelihood and magnitude of the range of expected financial impact. The Internal Audit team, together with management, reviews and consolidates risk assessment results at the enterprise level, ensuring they reflect the combined impact of interrelated risks such that they would be managed effectively. Risks identified as "top risks" are reviewed annually with Luxfer's Executive Leadership Team, the Audit Committee, and the Board of Directors as a whole.

## Managing Risks

After material risks are reviewed, our ERM program involves the development, recommendation, and implementation of response plans appropriate to each risk. Response plans are developed and recommended by regional risk management teams, and then reviewed and modified as necessary with input from the Internal Audit Function. Once approved, the response plans are implemented under the oversight of management teams across the relevant locations or functions. Throughout the year, Internal Audit, with oversight from the Audit Committee, monitors the implementation and progress of response plans. Results from such monitoring are reported to the Audit Committee or full Board of Directors as appropriate.

## Human Rights and Modern Slavery Risks

A summary of the Company's material risks is included in our Annual Report. While the risks of modern slavery and human trafficking have been identified through our ERM program as potential risks, they are not identified as material or top risks for the Company.

Based on our due diligence and risk assessments, we have identified the below-listed general types of modern slavery risks that may be present in our operations and supply chains, and discuss the measures by which we manage and mitigate those risks below.

**Operational Risks.** We consider the location of our employees and the type of work undertaken as the basis for assessing the modern slavery risks in our operations. Insofar as our operations are concerned, the products and services that we provide to our customers are typically of a technical nature requiring a high level of skill, training, and/or education. Moreover, all persons directly employed in our businesses are required to be citizens, permanent residents, or have the legal right to work in the jurisdiction in which they are employed or seeking employment. As such, we do not consider operational modern slavery risks to be of a material nature. Nonetheless, the following processes assist Luxfer in mitigating potential modern slavery risks in our operations:

- **Pre-Employment Screening Process:** All potential employees and contingent workers are screened and, subject to local law, identity, employment history, nationality, right to work, and criminal records are verified. Original employment and identification documents are not maintained by the Company, and copies and/or records related thereto are maintained in accordance with applicable law.
- **Employment Contract or Offer Letter:** Depending on jurisdiction of employment, we ensure that all employees have an employment contract or offer letter that sets forth their rights and responsibilities with respect to wages, working hours, benefits, and other employment conditions.
- **Compliance with Labor Laws:** We maintain processes designed to comply with labor laws, including child labor laws. These processes ensure that we do not hire anyone under the age of 15 or, where the mandatory school leaving age is higher, said age in the applicable jurisdiction. We are committed to the development of young people through the provision of development and apprenticeship programs.
- **Contracted Labor:** Risks may arise from the engagement of contracted labor performing work on our behalf. Where we work with third-party recruitment or temporary labor agencies, said agencies are appropriately vetted; responsible for their compliance with applicable labor laws; and must not charge fees, costs, or deposits, directly or indirectly, to the worker.



**Supply Chain Risks.** Modern slavery risks within our supply chain are assessed through analysis of internal data sets based on where suppliers are located and the goods and/or services provided. Modern slavery risks within our supply chain are most acute in those parts where we have limited or no visibility, such as subcontractors using seasonal, low-skilled, and/or migrant labor and pre-smelter mineral sourcing. While we do not consider modern slavery risks within our supply chain to be of a material nature, we continue to monitor and implement actions to mitigate these risks as follows:

- **Supply Chain Selection and Due Diligence Processes:** As detailed above, examinations of new and existing vendors and suppliers are conducted regularly. We continue to explore and deploy new software and tools for conducting such examinations in a thorough and efficient manner.
- **Responsible Mineral Sourcing:** As discussed above, we recognise that the risk of human rights violations may be higher in operations involving certain minerals sourced from conflict-affected and high-risk areas. Accordingly, Luxfer conducts an annual evaluation and discloses certain information related to “conflict minerals” necessary to the functionality or production of our products, and, pursuant to our Third Party Code of Conduct, requires similar assessments and tracing throughout our supply chain.
- **Contractual Provisions:** To further mitigate risk across our supply chain, we ensure appropriate provisions on human rights and modern slavery are included in supply contracts and terms and conditions of purchase.

## COMPLIANCE AND PERFORMANCE ASSESSMENT

Luxfer’s potential and actual impacts on human rights are evaluated regularly. In an effort to assess the Company’s compliance with applicable laws and ethical standards, Luxfer maintains a Legal & Compliance Scorecard covering all our manufacturing locations and corporate functions. Managed by Luxfer’s General Counsel and Company Secretary, the Scorecard considers key data sources, including the percentage of completed compliance trainings; whistleblowing or other compliance reports; lawsuits and government actions; compliance with Luxfer’s Third Party Code of Conduct; and corporate policy management and attestations from employees. Luxfer’s General Counsel tracks Scorecard progress and reports results to the Board’s Nominating and Governance Committee on a quarterly basis. In 2025, we intend to use a variation of the metrics reported as part of the Legal & Compliance Scorecard as Key Performance Indicators to measure the effectiveness of steps being taken on matters related to modern slavery, human rights, and supply chain responsibility.

2025 Key Performance Indicators			
Percentage of completed compliance trainings on modern slavery, human rights, and supply chain responsibility topics	Percentage of workforce who received comprehensive onboarding and have attested to compliance with corporate policies on modern slavery and human rights	Number of whistleblowing or other compliance reports regarding human rights or modern slavery in our business operations or supply chain	Percentage of Third Parties onboarded, attested to compliance, and reviewed against Third Party Code of Conduct
			

To further evaluate our human rights compliance and performance, we benchmark our practices against external indices, including various ESG rating agencies, to ensure that our approach is in line with industry best practices, established standards, and recognised challenges. Luxfer has achieved best possible ratings with respect to our Social practices, including through regular assessment of our human rights, labor, health and safety, and supply chain and ethical sourcing processes. While these ratings vary from time to time, we continue to maintain overall rankings above the average scores of our industry peers.

## REPORTING

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Luxfer highly encourages reporting of any wrongdoing regarding human rights violation and requests that employees and stakeholders bring to light any issues or grievances relating to any potential human rights concerns or violations. 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 multilingual 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 receptive to stakeholder input on 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, Lumns Lane, Manchester, M27 8LN, England.

## APPROVAL

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This Statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015 and has been approved by the Board of Directors for Luxfer Holdings PLC for the fiscal year ended 31 December 2024.



**Andy Butcher**  
Chief Executive Officer  
Luxfer Holdings PLC

4 March 2025