



**LUXFER**  
**EQUAL OPPORTUNITY, NON-DISCRIMINATION,**  
**AND ANTI-HARASSMENT POLICY**

Version 4.0  
Effective Date: April 3, 2025

## **1.0 POLICY STATEMENT**

Luxfer Holdings PLC (“Luxfer” or the “Company”)<sup>1</sup> strives to create and maintain a work environment in which people are treated with dignity, decency, and respect. Luxfer is an equal opportunity employer and believes that professional conduct furthers the Company’s mission, promotes productivity, minimizes disputes, and enhances our reputation. At Luxfer, the work environment should be characterized by mutual trust and the absence of intimidation, oppression, and exploitation. Luxfer does not tolerate unlawful discrimination or harassment related to any legally protected characteristic or that otherwise violates this Policy.

## **2.0 PURPOSE**

This Policy is designed to set forth Luxfer’s approach to equal opportunity, non-discrimination, and anti-harassment in the workplace and in work-related settings. It sets standards and expectations for appropriate business conduct and acceptable behavior for persons associated with Luxfer. This Policy should be read together with Luxfer’s Code of Ethics and Business Conduct, Human Rights and Labor Practices Policy, Data Protection and GDPR Policy, and Third Party Code of Conduct, which apply to the entire Luxfer organization and those with whom Luxfer conducts business.

## **3.0 SCOPE**

This Policy applies to all directors, officers, employees, consultants, independent contractors, volunteers, interns, casual workers, students, and agency workers, including any part-time, fixed-term, or temporary workers, and any persons employed by or affiliated with Luxfer in any way (“personnel”).

This Policy applies to all terms of employment, including recruitment, job assignment, remuneration, benefits, training, promotion, discipline, termination, and retirement. Moreover, this Policy applies in any dealings with clients, customers, suppliers, vendors, visitors, or other work-related contacts. Any conduct prohibited by this Policy is unacceptable in the workplace and in work-related settings, such as during business trips, business meetings, and business-related social events.

## **4.0 PROTECTED CHARACTERISTICS**

It is a violation of this Policy for any Luxfer personnel to discriminate against or harass an individual on the basis of age, race, ethnic origin or ancestry, color, gender (including gender identity, gender expression, and gender reassignment), creed, religion (including all aspects of religious belief, observance, or practice, such as religious dress or grooming practices), social origin, family status, marital status, civil partnership status, pregnancy or maternity, physical or mental disability, medical condition, genetic information, sex, sexual orientation, military or veteran status, or any characteristic protected by law (“Protected Characteristics”).

## **5.0 EQUAL OPPORTUNITY**

Luxfer is an equal opportunity employer and is committed to providing employment opportunities without regard to Protected Characteristics. We seek to maintain a highly productive organization of individuals who (i) represent differences in viewpoints, cultures, and experiences and (ii) embrace unique ideas produced by such diversity. Luxfer makes employment decisions based on objective business criteria and the qualifications, abilities, and experience of individuals. Specifically, the

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

Company acts in accordance with the following principles when making employment decisions: (i) shortlisting is to be completed by more than one person whenever possible; (ii) vacancies are to be advertised to a diverse section of the labor market, and advertisements shall avoid using language that may discourage particular groups from applying; (iii) job candidates are not to be asked questions which might suggest an intention to discriminate on the grounds of any Protected Characteristic during the interview process or at any time during employment; and (iv) job candidates are not to be asked about health or disability before a job offer is made, except in very limited circumstances allowed by law (e.g., to check that the candidate could perform an intrinsic part of the job, taking in to account any reasonable accommodation). By making employment decisions in accordance with such principles, Luxfer is committed to providing employment and advancement opportunities, remuneration, and benefits without discrimination.

## **6.0 NON-DISCRIMINATION**

Luxfer is dedicated to providing a work environment where all persons can work together safely and productively, free from unlawful discrimination. Any act of unlawful discrimination on the basis of any Protected Characteristic in the workplace or in work-related settings is strictly prohibited. Furthermore, Luxfer prohibits (i) any form of discrimination in the provision of employment opportunities, benefits, or privileges; (ii) discriminatory work conditions and behaviors; and (iii) the use of discriminatory evaluative standards in employment. Conditions of service, benefits (including pay, bonus criteria, and all other benefits offered by Luxfer), and facilities shall be regularly reviewed to ensure that (i) they are provided on a non-discriminatory basis; (ii) they are available to all personnel who should have access to them; and (iii) there are no unlawful barriers to their access. Luxfer expects all personnel to share in its commitment to equal opportunity and non-discriminatory employment.

## **7.0 ANTI-HARASSMENT**

Luxfer prohibits all forms of harassment. Luxfer personnel have the responsibility to avoid any act or actions, implied or explicit, that may suggest any form of harassment to any other person in the workplace or in a work-related setting.

For purposes of this Policy, harassment is defined as unwelcome verbal, written, physical, or non-physical conduct that denigrates or shows hostility or aversion toward an individual and that (i) relates to any actual or perceived Protected Characteristic; (ii) has the purpose or effect of creating an intimidating, hostile, or offensive work environment; (iii) has the purpose or effect of unreasonably interfering with an individual's work performance; or (iv) otherwise adversely affects an individual's employment opportunities.

## **8.0 SEXUAL HARASSMENT**

Luxfer prohibits all forms of sexual harassment. For purposes of this Policy, sexual harassment is defined as unwelcome behavior of a sexual nature. Sexual harassment includes, but is not limited to, unwanted physical contact, verbal or written remarks of a sexual nature, written or graphic material of a sexual nature, and disparate or preferential treatment due to an individual's sex.

## **9.0 DIVERSITY AND INCLUSION PRACTICES**

The professional conduct of Luxfer's employees furthers Luxfer's mission, promotes productivity, minimizes disputes, and enhances our reputation. As such, Luxfer is committed to creating and maintaining a diverse, global workforce that provides fair and equitable opportunities, thereby advancing Luxfer's innovation culture and customer first values. To ensure effective teamwork and achievement of common business goals, all Luxfer employees are required to complete a variety of anti-harassment, non-discrimination, diversity, and unconscious bias trainings annually. Luxfer engages in the ongoing development of a diverse, global workforce that encourages and enforces:

- Respectful communication and cooperation between all personnel;
- Teamwork and personnel participation, permitting the representation of all groups and perspectives; and
- Company and personnel contributions to the communities we serve to promote a greater understanding and respect for diversity.

Through these efforts, Luxfer empowers personnel and fosters respect and fairness across the Company and Luxfer remains committed to continuing to support the evolving needs of its workforce and business.

## **10.0 REPORTING**

Luxfer strongly encourages the prompt reporting of all actual or perceived incidents of discrimination, harassment, or retaliation, regardless of the identity or position of the perceived offender. Personnel 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. Serious violations may also be reported 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).

The availability of this reporting procedure does not preclude individuals who believe they are being subjected to harassment from promptly advising the offender that their behavior is unwelcome and requesting such behavior immediately cease.

The Company will take appropriate and immediate action in response to any complaints, reports, or knowledge of violations of this Policy. 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 Department will take adequate steps to ensure that the complainant is protected against retaliation during and after the investigation. All information pertaining to a complaint or investigation under this Policy will be maintained securely.

No retaliation or hardship, loss of benefits, nor penalty may be imposed on any personnel as punishment for filing a good faith complaint of discrimination or harassment or responding to a complaint of discrimination or harassment. Anyone engaging in retaliation or attempted retaliation may be subject to discipline, up to and including termination.

## **11.0    RESPONSIBILITY FOR THIS POLICY**

All Luxfer personnel are required to promote equal opportunity and prevent discrimination and harassment in the workplace. They are also expected to help create and maintain an atmosphere where concerns under this Policy can be raised without fear of retaliation or intimidation.

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.

<b>VERSION</b>	4.0
<b>EFFECTIVE DATE</b>	April 3, 2025
<b>LAST REVIEW DATE</b>	August 20, 2021
<b>NEXT REVIEW DATE</b>	August, 2026
<b>STANDARD CONTACT</b>	Janelle Ramos, General Counsel