LUXFER GROUP

ANTI-BRIBERY POLICY (SUMMARY)

Bribery *is the offering, promising, giving, requesting or receiving of money, or anything else of value (including employment), to any person, organisation or government official in order to induce that person to do something improper. This usually concerns attempts to obtain or retain business or secure some other improper advantage.*

1.1 Luxfer Group values its reputation and image. It is the policy of the Luxfer Group to conduct all of our business in an honest and ethical manner. Luxfer Group is committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate.

1.2 Luxfer Group believes it is a fundamental principle of good business practice to respect local laws and customs when operating internationally. Luxfer Group will uphold all laws and regulations relevant to countering bribery and corruption in all the jurisdictions in which we operate, and comply with such laws and regulation in good faith and spirit. Luxfer Holdings PLC, as a United Kingdom company with many of its businesses operated by UK companies, is bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both **at home and abroad.** Our US companies and their officers and personnel that work within them are also bound by the US Foreign and Corrupt Practices Act on the same basis.

1.3 Luxfer Group operates in a global economy where business ethics are playing an increasingly critical role. The days when bribery and corruption may have been viewed by some misguided people as an acceptable means of conducting business in certain regions of the world are now behind us. Just because certain practices may be followed or acceptable in a particular region or country it does not make that practice lawful. Luxfer Group is committed to implementing and enforcing effective systems to counter bribery.

1.4 Luxfer Group's full policy document sets out Luxfer Group's responsibilities, and the responsibilities of our employees and associated persons in observing and upholding the Group's position on bribery and corruption.

1.5 We will provide information and guidance to our employees and associated persons on how to recognise and deal with bribery and corruption issues when acting on our behalf.

1.6 We will give guidance on the assessment of our risk of exposure to bribery and on the elimination or mitigation of those risks.

1.7 We will encourage employees and other associated persons to be vigilant and confident in reporting any suspicion of bribery through proper channels.

1.8 Bribery and corruption are punishable in the UK for individuals by up to ten years' imprisonment and/or unlimited fine. If any of our UK companies were to be found to have taken part in bribery or corruption anywhere in the world we could face an unlimited fine with the ensuing adverse financial consequences, be excluded from tendering for public contracts and face untold damage to our reputation and image worldwide. Directors and officers can also incur personal liability if the offence is committed with their consent or connivance. If the bribery or corruption involved another country, there could be additional consequences under their laws. Any such allegation or finding of bribery or corruption could trigger investigation in other jurisdictions such as the United States of America. It could also result in the Group having to put in place more extensive and expensive monitoring of its workers' actions by third parties for a period of time. We must, and do, take our legal responsibilities very seriously.

1.9 The ethics and conduct expected from all employees and associated persons that work for and on behalf of the Luxfer Group is universally applicable wherever we operate.

1.10 We have identified particular risks which we believe are common to all our businesses. It is the responsibility of each of our business units to additionally assess its own particular risks in respect of the business it undertakes and update that risk assessment as often as necessary, but at least annually as part of its normal Luxfer Group risk assessment programme.

1.11 A recommended procedure to address such risks has been made available to our business units. Each business unit is responsible for adhering to those procedures and putting in place any further procedure to address additional risk that it has identified for its particular activities undertaken wherever in the world.

1.12 The Chief Executive undertakes personal responsibility for the implementation of this policy and the Managing Directors of each Division are responsible for ensuring the appropriate procedures are followed in their Divisions and that they are adequate for the various business activities they undertake. The Executive Management Board takes responsibility for reviewing the Anti-Bribery Policy annually and making any changes required.