

**Doing the
Right Thing.
Together.**



Our Code

Our Code of Ethics is the foundation of Johnson Matthey’s commitment to Doing the Right Thing.

It’s a guide for how to do business ethically, fairly and responsibly, and explains how to protect what is ours. It also ensures we look after each other and embed sustainability in everything we do.

The Code notes what good behaviour looks like and helps us to make ethical decisions. It is not just for JM colleagues but is relevant to all our stakeholders, from suppliers and customers to partners, agents, investors and the wider community.

It helps ensure we are Doing the Right Thing. Together.



Our commitments
and what Doing the Right Thing means



Understand how to use the Code to guide decision-making



Find help when you are unsure what to do



Speak Up if you have serious concerns

Use this navigation bar to take you to the next page or section



Playing your part

Doing the Right Thing underpins everything we do here. We are all responsible for behaving ethically, making good decisions and taking accountability – no matter our role.

An ethical culture makes us proud of who we are and where we work. It makes us stronger and more resilient, and it is an essential part of our continued success.

Liam Condon
Chief Executive



Our values, fundamental to our culture

By following our Code of Ethics we can ensure we behave in a way that aligns with our values.

These values help define our ways of working and they reflect how we do things when we are at our best.

They are fundamental to Johnson Matthey's culture, the personality of our company and set out what is important to us.



Acting with integrity

Doing the Right Thing through words and actions – even when no one is looking. Behaving with honesty, fairness and decency.



Protecting people and the planet

Practising the highest standards of health and safety, promoting wellbeing and safeguarding our planet.



Working together

Encouraging collaboration inside JM and out, sharing and embracing diverse viewpoints; treating others with respect and care.



Innovating and improving

Adapting and embracing new ideas, being confident and resilient through change; leading in our chosen markets.



Owning what we do

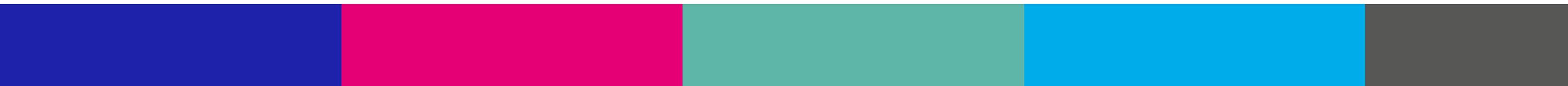
Taking accountability for our own work and demanding high standards from ourselves and our colleagues.

Our Code commitments

Our Code commitments support our values. They help define the workplace we all want to work in and highlight some of the everyday principles important to our jobs.

Our commitments are:

Hover over the icons to learn about each commitment.



Using the Code to guide decision-making

Making good, ethical decisions is important in your role at JM and our decision-making tool can help you navigate difficult decisions that may come your way.



Making good decisions



You are trusted to make good decisions at JM.

At times though, you may be faced with difficult decisions where it is unclear what the right thing to do is. You should stop, think clearly about the issue and consult our decision-making tool in these instances (see page 8). If you are still unsure, ask for help.

You never need to make difficult decisions on your own or without support.

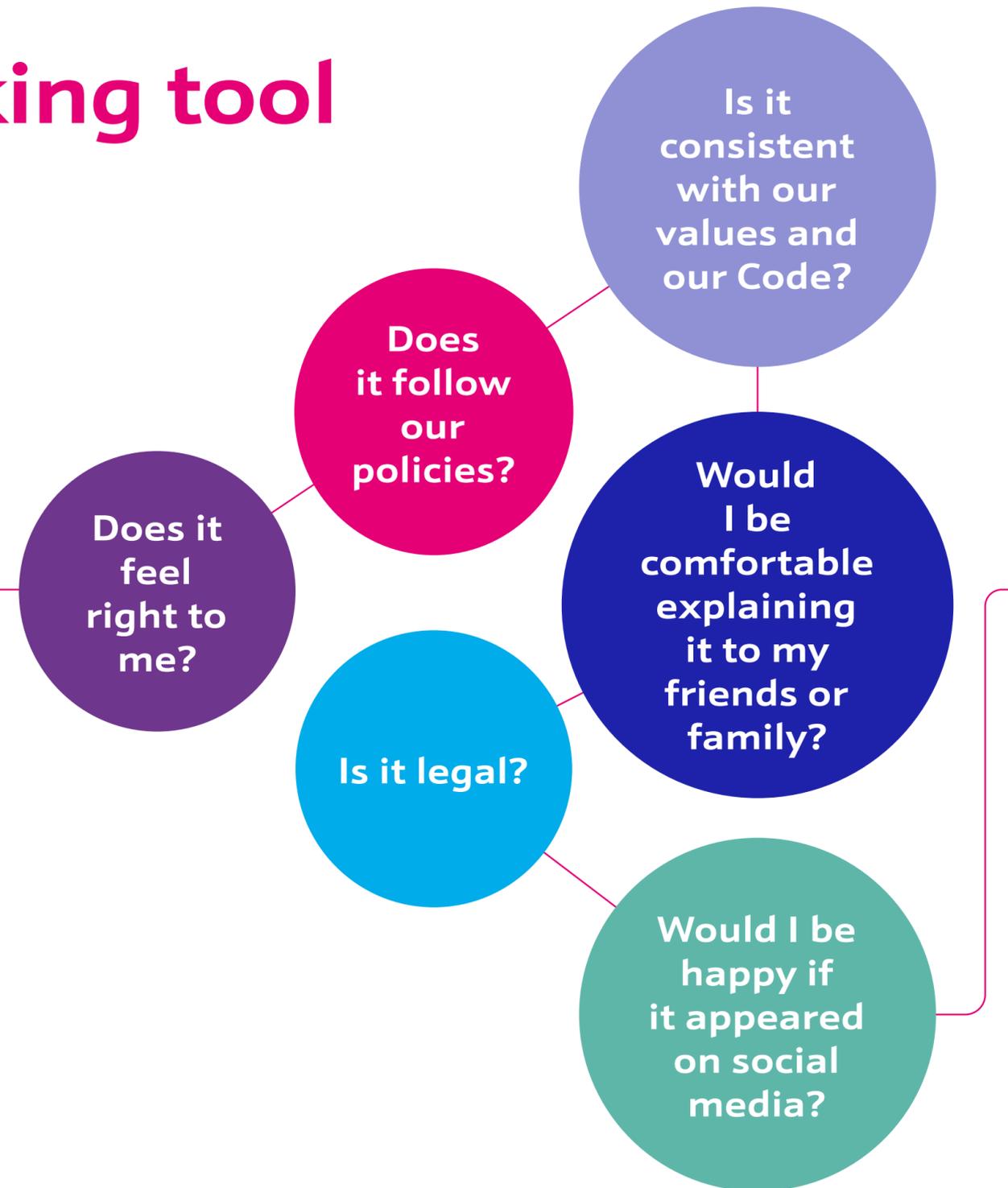


Our annual **online Code of Ethics training** provides you with the skills, knowledge and confidence to make good, ethical choices. Be sure to complete your training when it lands in your inbox.

Decision-making tool

Our decision-making tool is designed to help you if faced with a difficult decision.

Consider the ethical dilemma or decision you need to make. Then ask...



Why might good people do the wrong thing?

Good people may do the wrong thing for a variety of reasons:

Hover over each reason below to learn more.



If you see someone acting improperly, call it out or Speak Up through any of our channels. We have a zero tolerance policy for retaliation.

Asking for help, raising concerns

If you see or hear something that doesn't seem right, or if you make a mistake, it is always better to ask for help than to stay silent.

There are several ways you can do this...



You can...



Speak to your manager

Your manager is the first person to approach if you have a question, need further advice or want to raise a concern. Approach another manager or leader if you feel uncomfortable speaking to your own.



Find your local Ethics Ambassador

Our Ethics Ambassadors are here to point you in the right direction and answer any questions you might have about the Code and acting ethically. To find one local to you, search 'Ethics Ambassador' on myJM.



Contact HR or Legal

Ask questions, ask for advice or raise a concern directly with HR or Legal.



Speak Up

Speak Up about serious concerns through our Speak Up line. Find out more on page 14.

Our Ethics Ambassador network is here to help

We have a long-established global network of Ethics Ambassadors. These employees from across the business volunteer their time to help embed the Code of Ethics across JM.

Ethics Ambassadors are your local point of contact should you have ethical queries or concerns. They can signpost you to further resources or advise who to speak with if your concern needs to be escalated.

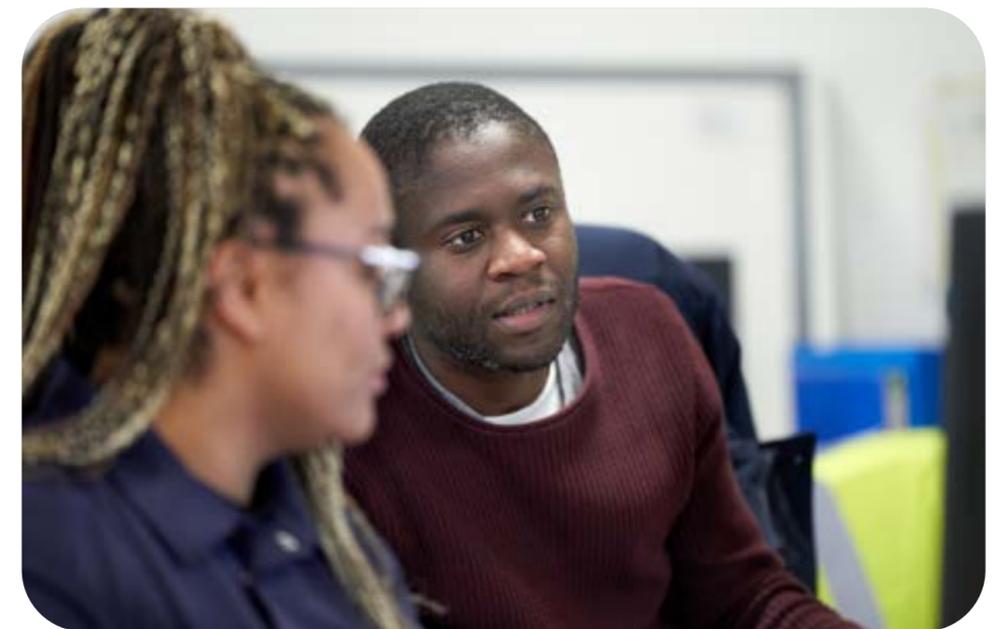
We have Ethics Ambassadors at most JM sites. To find one local to you, search 'Ethics Ambassador' on myJM.



"With over 100 Ethics Ambassadors, we know our sites well. Please let us know how we can help if you have any queries or concerns about ethical behaviour and Doing the Right Thing."

Did you know...

If you have any concerns relating to colleague interactions or conditions of employment, you can refer to our **Working Together Policy** for further advice and guidance.



Calling all people managers

If you are a people manager, you have a particular responsibility to promote ethical behaviour and make sure colleagues always do the right thing.



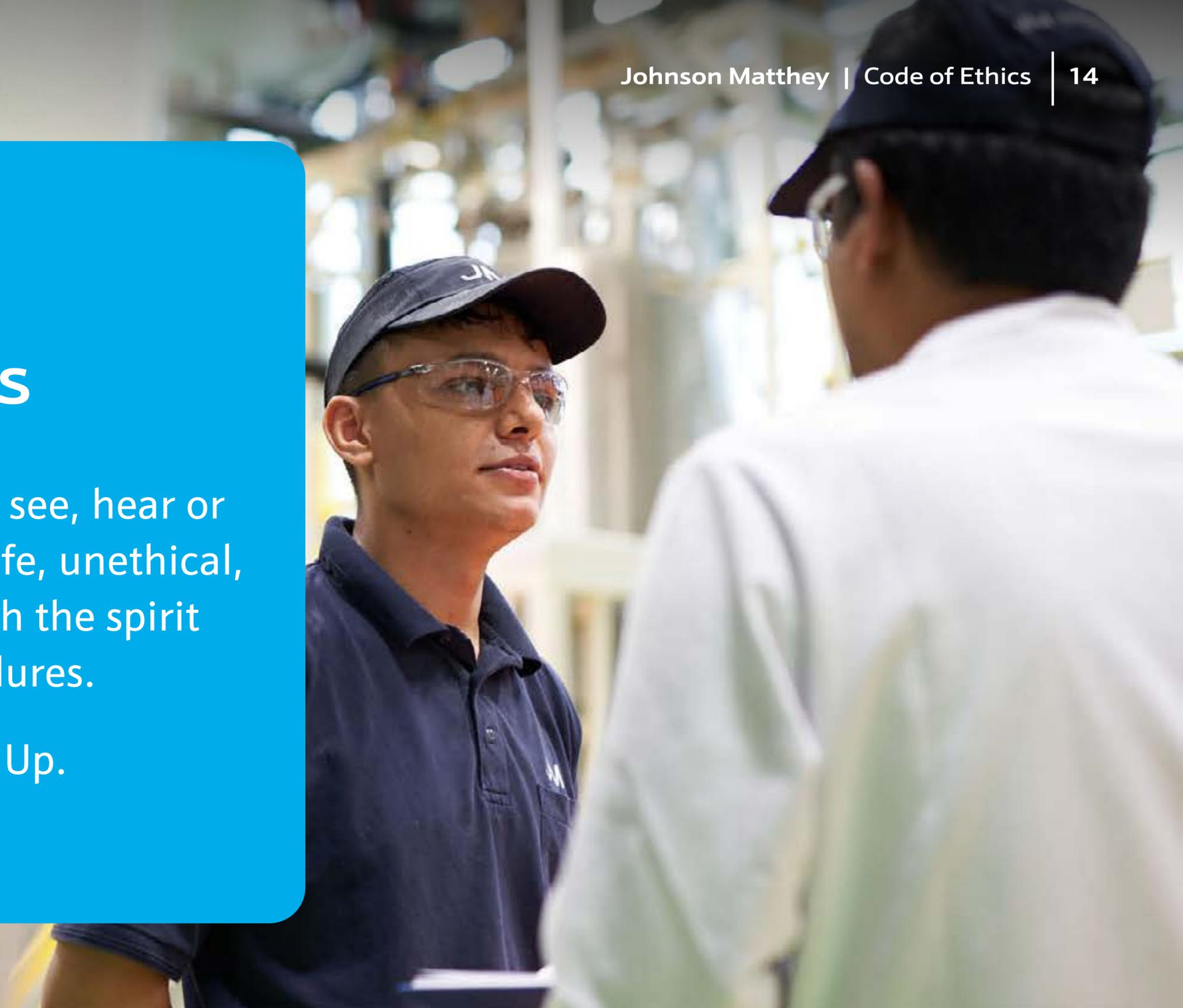
You should:

- Be a role model by acting consistently with our Code of Ethics and living our values.
- Hold your team accountable for behaviour inconsistent with our Code.
- Communicate frequently with your team regarding what Doing the Right Thing means – including specific examples.
- Never shy away from difficult conversations.
- Be there for your team, to listen and offer guidance.
- Create a safe environment for team members to raise concerns.
- Demonstrate zero tolerance for retaliation.
- Ensure your team completes the annual Code of Ethics training.

Speak Up with serious concerns

There may be times when you see, hear or suspect behaviour that is unsafe, unethical, unlawful or is inconsistent with the spirit of our Code, policies or procedures.

In this situation, please Speak Up.

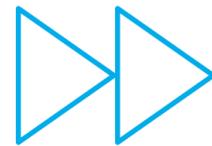


How to Speak Up

We always suggest you talk to your manager in the first instance about any serious concerns you need to raise. However, we understand sometimes this may be difficult. That's why we have a Speak Up line, which is a confidential telephone and online service hosted independently of JM.

How to Speak Up

You can raise serious concerns via our Speak Up line, which is accessible at speakup.matthey.com or by scanning the QR code below.



Don't wait

The earlier you Speak Up, the quicker the problem can be resolved. Don't wait until something has gone wrong or rely on others to Speak Up.

Once raised, we work hard to ensure all Speak Ups are dealt with promptly and thoroughly.



Confidentiality and anonymity

When you Speak Up, the information you provide will be dealt with confidentially. We understand in some situations you may not feel comfortable raising concerns openly. Therefore, you can raise a Speak Up anonymously, where legally permitted.

We never allow retaliation

We encourage you to Speak Up in good faith and we will protect employees who do so. Any claims of retaliation against those who Speak Up are taken very seriously. Disciplinary action, including termination, will be taken where retaliation is proven.



Remember, speaking up is not always easy, but it's the right thing to do.



Speak Up is for everyone. Whether you're a JM employee, partner, supplier, customer, contractor, agent or other member of the value chain.



For full guidance on the Speak Up process, please refer to **JM's Speak Up Policy and Guidance**.

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