Platinum and Palladium
Supply Chain

Policy Statement

Johnson Matthey Plc
2020
Johnson Matthey Platinum and Palladium Supply Chain Policy Statement

Johnson Matthey’s vision is for a world that’s cleaner and healthier, today and for future generations. We are leaders in sustainable technologies and we apply our science to solve our customers’ most complex problems. We work with suppliers, customers and partners to deliver this vision and we are determined that our customers and suppliers share our commitment to sustaining the highest standards of integrity and leadership.

Johnson Matthey’s sustainability framework and values are at the heart of our Supplier Code of Conduct and form the foundation for our relationships with suppliers. We expect our suppliers to support and align to our five core values. These core values are as follows:

- Protecting People and the planet
- Acting with Integrity
- Working together
- Innovating and improving
- Owning what we do

Johnson Matthey¹ is committed to conducting its business in line with our core values and vision and in compliance with all applicable laws. Our Code of Ethics and Supplier Code of Conduct set out the individual and collective responsibilities of our suppliers in this respect.

Responsible Platinum and Palladium sourcing

Responsible sourcing, trading, processing and movement of platinum and palladium are integral to Johnson Matthey’s vision and we are committed to doing business in line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (“OECD Guidelines”) and the Responsible Platinum and Palladium Guidance (“RPPG”) set out by the London Platinum and Palladium Market (“LPPM”). As such, Johnson Matthey:

- will not do business with Suppliers² that benefit from, contribute to or assist with any forms of torture, cruel or degrading treatment, forced or compulsory labour, child labour, other gross human rights violations such as widespread sexual violence, or war crimes or other violations of international humanitarian law.
- will not do business with Suppliers who provide direct or indirect support to non-state armed groups through the transport, trade, handling or export of minerals, nor those who provide direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain.
- will not do business with any Suppliers engaged in bribery and corruption. Johnson Matthey has a zero-tolerance approach to bribery and corruption. Bribery and corruption are never acceptable by, or on behalf of, JM. Our commitment and responsibilities to anti-bribery and corruption are set out in the JM Global Anti-Bribery and Corruption policy.
- will not do business with Suppliers engaged in any form of financial crime. Johnson Matthey’s Financial Crime Policy sets out our commitment and responsibilities with regards to mitigating the risk of participating in, or facilitating in financial crime, including money laundering, tax evasion, terrorist financing and other illegal activities that hide the origin of criminal proceeds.
- will not undertake any business in contravention of international sanctions or trade and export controls nor will it do business with suppliers who are acting in contravention of these controls. (together, the “Policy Commitments”)

Johnson Matthey will not engage with or will immediately suspend business with a Supplier if we identify a reasonable risk that it is in breach of any of the above or it is sourcing from, or linked to, any party in breach of any of the Policy Commitments.

¹ Johnson Matthey Group, including all affiliates and subsidiaries.
² For the purpose of this Policy, ‘Supplier’ refers to both suppliers from whom we purchase metals for refining, and customers for whom we refine platinum and palladium bearing materials, as well as those with whom we trade such metal.
Johnson Matthey will fulfil the Policy Commitments by:

- Conducting all applicable due diligence on all material containing platinum and palladium delivered to us for refining, regardless of content or quantity and all Suppliers of such material.
- Engaging with suppliers, customers and other stakeholders in the jurisdictions in which we operate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts.
- Allocating relevant resources and provide regular relevant training to all workers involved in the trading of platinum and palladium and/or acceptance and processing of platinum and palladium bearing materials.
- Maintaining records of all transactions and due diligence as per RPPG requirements.

Johnson Matthey Plc’s Board of Directors and its Group Management Committee are committed to this Policy fully and to supporting individual directors, officers and employees in complying with it.