



Johnson Matthey

Johnson Matthey North America Anti-Money Laundering Program and Policy

It is the policy of Johnson Matthey North America to prohibit the use of its businesses and services for money laundering, terrorist financing or other illegal activities conducted through commercial transactions.

The Johnson Matthey North America Anti-Money Laundering (AML) Program and Policy has been developed in conformance with the requirements of rules promulgated by the U.S. Department of Treasury, Financial Crimes Enforcement Network, 31 CFR Part 103, Section 130.140c, under the Bank Secrecy Act as amended by the USA PATRIOT Act of 2001 (Pub.L.107-56) and is based on Johnson Matthey's assessment of the money laundering and terrorist financing risks associated with transactions pertaining to covered goods purchased in excess of \$50,000 and sold in excess of \$50,000 in any tax or calendar year. Specifically, the Policy is based on four principles which are embodied in the AML Program:

- The establishment of policies, procedures and internal controls based upon Johnson Matthey's assessment of the money laundering and terrorist financing risks associated with its business activities.
- Appointment of the Johnson Matthey North America Compliance and Executive (NACE) Committee having among its scope of focus the overall design, implementation and reporting of the AML Program. Establishment of an AML Compliance Sub-committee and designation of AML Compliance Officers who will be responsible for ensuring that: (i) the AML Program is implemented effectively; (ii) the AML Program is updated as necessary to reflect changes in the business unit risk assessments and experiences, current requirements of applicable regulations and further guidance issued by the U.S. Department of the Treasury; and (iii) appropriate personnel are trained regarding the AML Program and Policy. Additionally, Business Unit AML Coordinators have been appointed to ensure effective implementation at covered Johnson Matthey business facilities.
- On-going education and training of appropriate personnel concerning the AML Program and their responsibilities thereunder.
- Independent testing to ensure the AML Program is functioning as designed.

For additional information regarding the AML Program and Policy, you may email Johnson Matthey at Compliance@JMUSA.com.