

## Global Anti-bribery and Corruption Policy

*All Colleagues, Contingent Workers and Suppliers (excluding Germany)*

### 1. Purpose

To ensure that:

- JM and its employees comply with global anti-bribery and corruption laws such as the UK Bribery Act (UKBA) and the U.S Foreign Corrupt Practices Act (FCPA).
- We conduct our business in accordance with the high ethical standards and values to which we hold ourselves accountable.

### 2. Definitions

Word	Definition
<b>Bribery</b>	Giving or receiving money or anything else of value with the intention of improperly influencing an act / decision or gaining an improper advantage. Examples can include: <ul style="list-style-type: none"> <li>• Gifts (including cash equivalents, such as gift cards)</li> <li>• Favourable contracts</li> <li>• Hospitality, such as meals, hotel stays, tickets or invitations to sporting or cultural events</li> <li>• Other promotional expenses (such as travel and accommodation expenses)</li> <li>• Favours that are of value to the recipient (such as offers of employment for a directly involved party or a relative of a party)</li> <li>• Free use of company services, facilities or property</li> <li>• Political contributions</li> <li>• Charitable donations</li> </ul>
<b>Corruption</b>	The misuse of power for private gain. Corruption can take many forms, such as fraud, extortion, Facilitation Payments or Bribery
<b>Facilitation Payment</b>	Unofficial payments or gifts made to secure or speed-up a public official's performance of a necessary government action or process. These government actions or processes include, but are not limited to, issuing licenses or permits, scheduling inspections and loading / unloading cargo.

### 3. Policy

- JM does not tolerate bribery or corruption.
- You must not offer or accept bribes. This applies equally to bribery of public and non-public officials.
- You may not use another person or organisation to bribe on JM's behalf.
- You must ensure third parties acting on JM's behalf are informed of JM's zero tolerance approach to bribery / corruption and we hold them to our standards. (Please refer to the Third Party Intermediary Procedure.)
- You must not make Facilitation Payments of any kind, even if they are customary business practice in the country you are in.
- You must not make political contributions using JM funds unless specifically authorised in advance and in writing by the GLT.
- All gifts and hospitality that are provided or received must comply with this policy and the GH&C Policy.
- You must report any suspected or actual acts of bribery / corruption to the Legal team or via the Speak Up process.
- Group Ethics and Compliance will oversee all Speak Ups and report into Ethics Panel except where they are conflicted out in which case it will be referred to the Ethics Panel or Audit Committee directly as appropriate.

## 4. Exceptions

Payments that would otherwise breach this policy may be made on an exceptional basis when you or another JM employee faces a threat of imminent harm, such as loss of life or personal injury. Where possible, you should notify the Group Ethics & Compliance team together with your line manager in advance of taking any action.

## 5. Consequences of Breach

Any breach of this policy could result in disciplinary proceedings, including termination of employment.

## 6. References

### 6.1 Associated Policies

- Code of Ethics: Doing the Right Thing <https://matthey.com/about-us/governance/code-of-ethics>
- Global Human Rights Policy [Global Human Rights Policy .docx](#)
- Global Working Together Policy [Global Working Together Policy.docx](#)

### 6.2 Associated Procedures

- Third Party Intermediary Procedure [Third party intermediary procedure](#)

### 6.3 Associated Guidance

- Speak Up Guide [Speak up guide](#)

## 7. Appendix

### 7.1. Document responsibilities

Document Role	Business roles
Approver (GLT Sponsor)	General Counsel & Company Secretary
Owner	General Counsel, Group
Writer	Head of Programmes and Operations

### 7.2 Version control

Version	Date	Change
1.0	09/11/2022	Simplified format to highlight the most important information to colleagues
1.1	11/03/2024	Updated Policy owner