

# Global Conflict Minerals and Cobalt Policy

*Audience Specific - see appendix and Contingent Workers (excluding Germany)*

## 1. Purpose

In conflict-affected and high-risk areas (CAHRA), the mining and trade of 3TGs and Cobalt can be used to finance conflict between armed groups and support human rights abuses / unethical business practices. Whilst Johnson Matthey has no mining operations in CAHRAs, the 3TGs and Cobalt we purchase from our Suppliers through our global supply chain potentially could originate from such areas in certain instances.

The purpose of this Policy is to ensure that:

- the sourcing of 3TGs and Cobalt in our supply chain does not directly or indirectly contribute to armed conflict, human rights abuses or unethical business practices in CAHRAs; and
- we can support local economies in CAHRAs responsibly by allowing the use of verified 3TGs and Cobalt from CAHRAs in our supply chains.

## 2. Definitions

Word	Definition
<b>Conflict-affected and high-risk areas or CAHRAs</b>	Countries or areas with high demand minerals, who are either suffering from a state of armed conflict or fragile post-conflict, as well as areas experiencing weak governance / security and widespread / systematic violations of international law.
<b>3TGs</b>	Tin, Tantalum, Tungsten and Gold.
<b>OECD Guidance</b>	OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs.
<b>Suppliers</b>	3TG and Cobalt suppliers with whom JM has a direct relationship.
<b>Value Chain</b>	Includes suppliers and business partners.

## 3. Policy

### 3.1 Policy Commitments

When sourcing 3TGs and Cobalt, Johnson Matthey will:

- Where high risks relating to human rights are identified, mitigate the risks where possible, and where actual adverse impacts are identified, depending on the nature of the impact, we will work with our value chain partners to put necessary remedial plans in place. Our approach will be based on our position in the value chain, business relationship, nature of the impact and our involvement with the impact.
- Where it is not been possible to mitigate risks and/or remediate adverse impacts with a value chain partner relating to human rights, we may ultimately have to cease working with them.

When sourcing 3TGs and Cobalt, Johnson Matthey will not do business with Suppliers:

- **that benefit from, contribute to, assist with or facilitate the commission by any party of:** (i) any forms of torture, cruel, inhumane or degrading treatment; (ii) forced or compulsory labour; (iii) child labour; (iv) other gross human rights violations and abuses such as widespread sexual violence; or (v) war crimes or other violations of international humanitarian law, crimes against humanity or genocide;
- who provide direct or indirect support to non-state armed groups through the extraction, 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; or
- engaged in bribery and corruption or other financial crime or violate (directly or indirectly) international sanctions or export control laws.

### 3.2 Expectations of our Suppliers

We expect our Suppliers to:

- comply with the principles in our Policy Commitments and Supplier Code of Conduct;
- have their own responsible sourcing policy, due diligence programme and management systems consistent with the OECD Guidance and implement their own responsible sourcing expectations with their suppliers;
- ensure they, or the smelters and refiners used in their supply chain (as applicable), are validated by an independent third-party audit programme; and
- provide JM with all reasonably requested due diligence information in a reasonable timeframe.

Where a Supplier fails to meet these expectations, suspension, refusal or termination of business may result.

### **3.3 Due Diligence**

We are committed to undertaking due diligence in line with the OECD Guidance. The Policy Commitments require our adherence as follows:

- the appropriate level of due diligence must be undertaken before entering any relationship with a Supplier and annually throughout the duration of the relationship with the Supplier; and
- where concerns have been identified, there is a clear escalation process that will include risk management strategies.

### **3.4 Customers**

JM is committed to responding to customer requests regarding the sourcing of 3TGs and Cobalt in a reasonable timeframe.

### **3.5 Responsibilities**

The Conflict Minerals & Cobalt Guide sets out relevant employee responsibilities required to comply with this policy.

## **4. Exceptions**

Not applicable.

## **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](#)

### **6.3 Associated Materials**

- Supplier Code of Conduct [Partnering with us | Johnson Matthey](#)

## 7. Appendix

### 7.1. Document responsibilities

Document Role	Business roles
Approver (GLT Sponsor)	General Counsel & Company Secretary
Owner	General Counsel, Group
Writer	Assistant General Counsel Ethics, Compliance & Sustainability

### 7.2 Version control

Version	Date	Change
1.0	09/11/2022	Changes include 1) additional responsible sourcing statements and due diligence requirements for cobalt 2) focus on essential responsible sourcing message and transfer responsibilities and accountabilities for audience specific workers to the Conflict Minerals & Cobalt User Guide.
1.1	11/03/2024	Updated Policy owner information.
1.2	26/11/2024	Policy commitments section amended to make consistent with Human Rights Policy.

### 7.3 Policy audience

Functions	Applicable? (Y/N)	Job families Policy is relevant to
Administration		
Security		
IT		
Corporate Affairs		
Finance		
HR		
Legal and IP		
Project Management		
R&D		
Engineering		
EHS		
Manufacturing		
Supply Chain	Y	Directors, Managers
Procurement	Y	Directors, Managers, Buyers, Administrators
Transport & Planning		
Quality		
Commercial	Y	Directors, Managers, Analysts, Specialists, Supervisors, Sales Reps, Administrators, Support
General Management	Y	GLT