

Global Conflicts of Interest Policy

All Colleagues and Contingent Workers (excluding Germany)

1. Purpose

To ensure that:

- Employees avoid or appropriately manage any potential or perceived conflict of interest.
- Employees act responsibly, ethically, legally and in the best interests of Johnson Matthey.

2. Definitions

Word	Definition
Conflicts of Interest	<p>A conflict of interest arises where an employee’s personal, social, financial or political activities or relationships may conflict with or otherwise compromise their obligations or duties to JM, the interests of JM or their judgment and independence in doing what is best for JM.</p> <p>Some common situations that could lead to a conflict of interest are:</p> <ul style="list-style-type: none"> • Ownership of, or investment in, a company that has dealings with or is a competitor of JM. • Hiring or supervising family or friends. • Family or friends who work for a customer, supplier or competitor. • Membership of an external board of directors • JM employees engaging with JM vendors for private work / services
Perceived Conflict of Interest	<p>A perceived conflict of interest occurs where an individual could have a reasonable belief that another individual is conflicted or unduly influenced, even if there is no actual conflict of interest.</p>

3. Policy

- Employees must avoid conflicts of interest that arise between their own interest and those of the Company.
- Employees are responsible for identifying any potential or perceived conflict of interest regarding themselves or others and disclosing them.
- Having identified a potential or perceived conflict of interest, an employee shall immediately notify their manager (or local Legal or HR contact if more appropriate).
- The disclosing employee’s manager (or local Legal / HR as necessary) will determine how the conflict should be managed or avoided.
- Conflicts of interest and actions taken shall be recorded on the Conflict of Interest report form and retained on the employee’s personnel file held on the relevant system of record.

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

- Global Anti-Bribery and Corruption Policy [Global Anti-Bribery and Corruption Policy \[final\].docx](#)
- Code of Ethics: Doing the Right Thing <https://matthey.com/about-us/governance/code-of-ethics>
- Global Financial Crime Policy [Global Financial Crime Policy \[final\].docx](#)
- Global Gifts, Hospitality and Charitable Donations Policy [Global Gifts Hospitality and Charitable Donations Policy \[final\].docx](#)

6.2 Associated Procedures

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

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

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 information
1.2	22/10/2024	Reviewed and minor changes save for links to document. Definition of perceived conflict added.