

## Global Financial Crime Policy

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

### 1. Purpose

To ensure that:

- We do not participate in – and our businesses / services are not used to facilitate – financial crimes such as Bribery & Corruption, Money Laundering, Tax Evasion, Fraud and Terrorist Financing.
- We are aware of the Financial Crime “red flags” list.

### 2. Definitions

Words	Definition
<b>Bribery &amp; Corruption</b>	Giving or receiving money illegally or unethically intending to influence a person’s (can be a public/government official or any person in many countries) actions.
<b>Criminal Property</b>	Property that is or represents a person's benefit from criminal conduct, where the person knows or suspects the property represents such a benefit. For example, this can include receiving funds or goods where we suspect they derive from criminal conduct (eg, goods received following a bribe paid to a customs official).
<b>Financial Crime</b>	Includes Bribery & Corruption, Money Laundering, Tax Evasion, Fraud and Terrorist Financing and any other illegal activities that hide the origin of Criminal Property.
<b>Fraud</b>	Dishonestly obtaining benefit or causing a loss by deception, false representation or abuse of position.
<b>Higher Risk Third Party</b>	For purpose of this Policy, a Higher Risk Third Party includes any JM business partner: <ul style="list-style-type: none"> <li>• involved in the sale or purchase of higher risk products or services, such as precious metals or refining (excluding the recycling of JM’s own spent base catalyst metal);</li> <li>• doing business or performing services in a higher risk jurisdiction from a Financial Crime perspective;</li> <li>• requiring unusual or complex transaction structures, such as cash transactions, complex supply chains, complex tax arrangements; or</li> <li>• acting suspiciously or otherwise creating risk of Financial Crime.</li> </ul>
<b>Money Laundering</b>	The process of concealing the true origins of criminal proceeds and integrating those proceeds into the legitimate economy. The primary money laundering offences involve dealing in Criminal Property or conspiring with others to allow them to deal in or keep Criminal Property.
<b>Tax Evasion</b>	Deliberately or dishonestly cheating the public revenue or fraudulently evading tax. Tax Evasion includes facilitating the evasion of tax, which can occur when one is knowingly concerned in, or takes steps with a view to aiding, abetting, counselling or procuring the commission of that evasion.
<b>Terrorist Financing</b>	Providing money or other property to groups with the intention, knowledge or suspicion that those groups will use the property for terrorist purposes.

### 3. Policy

- You must not engage in any activity that constitutes, facilitates or assists another person in committing a Financial Crime.
- You must review the “red flags” list.
- You must report any suspicions or actual knowledge you have that a Financial Crime has / will occur to the Legal Team.
- You must work with the Legal Team to conduct appropriate Financial Crime due diligence in the following situations:
  - before entering into a business relationship with a Higher Risk Third Party;
  - whenever information on a Higher Risk Third Party has changed, such as a change to their banking details, company name, ownership, location, or type of business activities; or
  - where there is a reason to suspect a third party is involved in Financial Crime.
- Finance must establish minimum financial controls sufficient to mitigate the risk of Financial Crime.

### 4. Exceptions

All requests for exceptions to this policy must be referred to the Group Head, Ethics & Compliance, or their designee, for approval.

### 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 Gifts, Hospitality and Charitable Donations Policy [Global Gifts Hospitality and Charitable Donations Policy \[final\].docx](#)
- Global Speak Up Policy [Global Speak Up Policy \[final\].docx](#)

#### 6.2 Associated Guidance

- Financial Crime Manual [Financial Crime \(sharepoint.com\)](#)
- Financial Crime Reg Flags List [Financial Crime Manual - Red flags.pdf \(sharepoint.com\)](#)
- Financial Crime – New Contract Guidance [Financial Crime Policy - Contractual Guidance.pdf \(sharepoint.com\)](#)

### 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	Simplified format to highlight the most important information to colleagues
2.0	23/10/2024	Bribery & corruption and fraud added to broaden scope to include the main financial crimes.

### 7.3 Policy audience

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