

Global Human Rights Policy

All Colleagues and Contingent Workers (excluding Germany¹)

1. Purpose

Johnson Matthey Plc and our group companies (JM) are committed to respecting and upholding human rights throughout our operations and supply chain. This policy defines our commitment to human rights and reflects the expectations we have for ourselves, our colleagues and our suppliers.

2. Definitions

Word(s)	Definition
Human rights	Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination.
Internationally recognised human rights	Expressed in the International Bill of Human Rights and the eight International Labour Organisation fundamental conventions within its Declaration on Fundamental Principles and Rights at Work.
Workers	Includes senior managers, officers, directors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term workers, casual and agency staff, and volunteers.
Adverse impact	Action(s) that results in unwanted or unanticipated consequences.
Discrimination	Discrimination is the different or unfair treatment of a person, due to their characteristics or association with a group.
Harassment	Any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.
Diversity	Diversity encompasses all the various ways in which people differ from one another, including the different characteristics that make one group or individual different from another.
Inclusive culture	A culture where everyone feels welcome by actively inviting every person or every group to contribute and participate.
Fairly remunerated	We ensure that all workers receive reward and benefits that are fair, competitive and aligned to individual roles, experience and responsibilities. This includes, but not limited to, aspects of pay, holiday, employee leave and overtime.
Fair and just working conditions	Working conditions which respect the health, safety and dignity of everyone; this includes, but is not limited to, access to WASH (water, sanitation and hygiene) facilities, limitation of maximum working hours, daily and weekly rest periods and an annual period of paid leave.
Land rights	The right to use, control, and transfer a parcel of land.
Due diligence (for human rights)	A process to identify, prevent, mitigate and account for how we address our adverse human rights impacts.
Third parties	Includes business partners, suppliers, customers, contractors, agents and members of the public.

3. Policy

3.1 Our commitment and focus

- Our commitment is defined by internationally recognised human rights and will be implemented and operationalised in accordance with UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the ten principles of the UN Global Compact (to which we are a signatory).
- We commit to respecting the higher standard where national law and international human rights standards differ. If there is conflict between the two, we will adhere to national law, while seeking to respect international human rights to the greatest extent possible.

- We are focused on the areas of human rights where the risk of an adverse impact on people is most significant and where we have leverage in our operations and with our suppliers. We:
 - are committed to safeguarding the health, safety and wellbeing of our workers and the communities where we operate.
 - do not tolerate any form of discrimination or harassment and are committed to promoting diversity and an inclusive culture.
 - are committed to ensuring workers are fairly remunerated and provided with fair and just working conditions.
 - are committed to workers' rights to fair procedures and remedies, and workers' rights of freedom of association and collective bargaining.
 - work to ensure there is no modern slavery (all forms of forced or compulsory labour) or human trafficking in our and our suppliers' operations.
 - work to ensure there is no child labour in our and our suppliers' operations.
 - work to ensure our operations respect our local communities.
- We also recognise the importance of land rights of communities and threats to indigenous people within our and our suppliers' operations.

4. Roles and responsibilities

4.1 Our colleagues

- Workers have an individual responsibility to respect human rights at JM and raise human rights concerns.

4.2 Our suppliers

- We expect our suppliers to play a leading role in supporting our commitment to respecting human rights, both directly and through their own supply chains.
- Our suppliers must adhere to our Supplier Code of conduct.

5. Due diligence

- Through our systems and controls we identify and assess our human rights risk areas, undertaking due diligence proportionate to the risk level, effectively managing risk, monitoring and reporting on our progress.
- Where high risks relating to human rights are identified, we aim to mitigate and prevent these risks where possible.
- Where actual adverse impacts are identified, depending on the nature of the impact, we will work with our suppliers to suggest necessary remediation plans. 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 possible to mitigate risks and/or remediate adverse impacts with a supplier relating to human rights, we may ultimately have to cease working with them.
- We will periodically review our human rights risk areas to ensure our priorities reflect the nature of our business and how it may impact all stakeholders.

6. Governance

- The Societal Value Committee (SVC) oversees the human rights policy and its implementation.

7. Grievance mechanism

- We have various mechanisms for soliciting feedback from our workers including human rights concerns. We encourage our workers to raise concerns openly through either their line managers, contacting their local or Group contact in a relevant function (such as HR, Legal, EHS) or submitting a Speak Up case.
- We provide workers and all third parties with an independently run Speak up helpline (accessed online or via telephone) where human rights concerns can be raised anonymously (where local law permits). The helpline is available 24/7 and in multiple languages.
- All Speak up cases raised honestly are treated seriously and confidentially, overseen by an independent group of senior leaders. Speak up cases are investigated in a timely and consistent manner and, where breaches are found, appropriate actions and effective remedy are taken.

- We have a zero-tolerance policy for retaliation towards anyone who raises a Speak Up in good faith or helping with an investigation.

7. Consequences of breach

Any breach of this policy will be thoroughly investigated and appropriate action will be taken, including disciplinary proceedings which could result in termination of employment.

8. References

8.1 Associated policies

- Code of Ethics: Doing the Right Thing <https://matthey.com/about-us/governance/code-of-ethics>
- Global Corporate EHS Policy [Global Corporate EHS Policy.docx](#)
- Global Employee Leave Policy [Global Employee Leave Policy.docx](#)
- Global Diversity, Equity, Inclusion and Belonging Policy [Global Diversity Equity Inclusion and Belonging Policy.docx](#)
- Global Speak Up Policy [Global Speak Up Policy \[final\].docx](#)
- Global Working Together Policy [myjm.sharepoint.com/teams/GroupPolicies/Policies/Forms/AllItems.aspx?id=%2Fteams%2FGroupPolicies%2FPolicies%2FGlobal Working Together Policy %2Epdf&parent=%2Fteams%2FGroupPolicies%2FPolicies](https://myjm.sharepoint.com/teams/GroupPolicies/Policies/Forms/AllItems.aspx?id=%2Fteams%2FGroupPolicies%2FPolicies%2FGlobal%20Working%20Together%20Policy%20Epdf&parent=%2Fteams%2FGroupPolicies%2FPolicies)

8.2 Associated documents

- Supplier Code of Conduct <https://matthey.com/en/about-us/partnering-with-us>
- [Nature strategy statement](#)

9. Appendix

9.1 References

1. Subject to approval from the German works council.

9.2 Document responsibilities

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

9.3 Version control

Version	Date	Change
1.0	09/11/2022	Simplified format to highlight the most important information to colleagues
2.0	02/12/2024	Amendments to ensure consistency with other global policies, insertion of due diligence and governance sections and replacement of value chain with own operations and suppliers.