

Global Speak Up Policy

All Colleagues and Contingent Workers (excluding Germany)

1. Purpose

To ensure that:

- Legitimate concerns or issues are raised promptly without fear of retaliation.
- We minimise the impact of any potential wrongdoing and implement appropriate remedial measures.

2. Definitions

Word	Definition
Speak Up / Speaking Up	The formal process of workers or stakeholders raising legitimate concerns at JM, which are recorded in JM's Speak Up case management system.
Stakeholders	Includes customers, suppliers, third party partners, investors, local community members or any other persons with a connection to JM.
You	Means workers or stakeholders.
Workers	Includes senior managers, officers, directors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term workers, casual and agency staff, and volunteers.

3. Policy

3.1 General Principles

- A Speak Up should be raised when you know or suspect something is unlawful, unsafe or contrary to our Code of Ethics.
- We have a zero-tolerance policy for retaliation towards anyone for raising a Speak Up in good faith or helping with an investigation. Retaliation is treated as a disciplinary matter for JM workers.
- We treat all Speak Ups confidentially. This means they will only be shared with a limited number of people on a strict need-to-know basis (subject to any local law requirements).
- We strongly encourage people filing Speak Ups to identify themselves to the case team so investigators can contact them directly where follow-up information is needed. However, where local law permits, Speak Ups can be made anonymously.
- All Speak Ups must be raised in good faith.
- You must not knowingly or intentionally make false allegations via Speak Up. Doing so could lead to disciplinary action if you are a worker.
- You should not use Speak Up for grievances or personal disputes (unless there is a legitimate reason why the channels in the Working Together Policy cannot be utilised).
- The Ethics and Compliance team within Group Legal will oversee all Speak Ups except where they are conflicted out in which case it will be referred to the General Counsel & Company Secretary, or Audit Committee directly as appropriate.

3.2 Speak Up Channels

- Internal Speak Up channels for workers include:
 - [Your manager](#) - As a general guideline, this is the first person to approach when you have a Speak Up unless they are compromised or you are uncomfortable doing so.
 - [Human Resources, local Legal Counsel, Ethics and Compliance](#) - Where your Speak Up is within the expertise of these functions.

- **Other functions** - Where your Speak Up is within the expertise of another function, such as EHS, you can raise it with your local or Group contact in these functions.
- **Ethics Ambassadors** - You can Speak Up to your Ethics Ambassador.
- Speak Up line for workers and any stakeholders:
 - Hosted by an independent third party – reports can be submitted by telephone or on-line.
 - Available in local languages at the sites where we operate.
 - Operates 24/7, 365 days a year. Visit speakup.matthey.com for further details.
 - If you file a report anonymously, please check the website or call the telephone line **within 5 days of making your report** and regularly thereafter – this will be the only way we can contact you.
- You are strongly encouraged to raise your concern internally via one of the channels mentioned above. However, you can report your concern to an external party where you believe our internal channels are compromised, you do not expect them to operate properly in the circumstances or where you have raised a concern internally and we have not responded in a reasonable timeframe.

4. Exceptions

All requests for exceptions to this policy must be referred to the General Counsel, Group 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

- Code of Ethics: Doing the Right Thing [Code of Ethics | Johnson Matthey](#)
- Global Human Rights Policy [Global Human Rights Policy .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%2FGlobal%2FWorking%2FTogether%2FPolicy%2Epdf&parent=%2Fteams%2FGroupPolicies%2FPolicies)

6.2 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	Assistant General Counsel, Ethics & Compliance

7.2 Version control

Version	Date	Change
1.0	09/11/2022	Policy updated to 1) align with the updated Working Together Policy; 2) comply with 2019 EU whistleblowing directive; and 3) focus on essential information for all employees and other interested third parties. Detailed information on the Speak Up process and Frequently Asked Questions are contained in the Speak Up Speak Up Guide
1.1	28/07/2023	Updated Speak Up web address added to Policy
1.2	22/10/2024	Removed reference to Ethics Panel and updated referral process if a conflict with the Ethics & Compliance team arises