

Global Conflicts of Interest Policy

1. Purpose

To ensure that:

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

2. Definitions

Word	Definition
Conflicts of Interest	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.
	Some common situations that could lead to a conflict of interest are:
	 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

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 conflicts 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 with local HR retaining a copy.