



Johnson Matthey
Inspiring science, enhancing life

Supplier Code of Conduct

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Introduction

We are Johnson Matthey. For over 200 years, we've used advanced metals chemistry to tackle the world's biggest challenges, making us a global leader in sustainable technologies.

Our expertise enables us to develop technology that decarbonises, reduces harmful emissions, and improves sustainability for many of the world's leading energy, chemicals, and automotive companies.

JM is a purpose-driven organisation aligned with suppliers who share our commitment to upholding the highest sustainability and leadership standards and our five core values — protecting people and the planet, acting with integrity, working together,

innovating and improving, and owning what we do.

JM suppliers share our commitment to uphold the highest integrity and sustainability leadership standards, and together, we value our people and those who work for us. We ensure the protection and dignity of workers, safeguarding our environment and acting with integrity in all our business practices.



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We manage our activities throughout the group to protect the environment and the health and safety of everyone associated with JM operations. We also embed Environment, Health, and Safety (EHS) risk management into JM's culture and processes — everyone has an active role to play.

We maintain health and safety standards with rigorous procedures and controls. Our employees receive regular health and safety training and are encouraged to report issues. We also provide a safe and accessible working environment, support the well-being of employees, and promote positive mental health.



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Our health and safety expectations of suppliers:

- Demonstrate there is a structured health and safety management system in place
- Set policies and objectives for health and safety purposes
- Notify Johnson Matthey of any significant incidents such as life-altering injuries and fatalities in your workforce, environmental pollution, and cybersecurity incidents should they occur
- Respect workers' rights to stop tasks if their health, safety, or well-being are compromised
- Provide health and safety training to workers before and during employment
- Equip production and associated machinery with appropriate operational safety devices
- Regularly maintain, inspect, and service associated machinery
- Provide and use personal protective equipment (PPE) where applicable
- Identify, evaluate, and control worker exposure to harmful substances
- Provide understandable information on all materials, usually in a Safety Data Sheet (SDS)
- Provide adequate cybersecurity controls to protect JM data and IT systems that deliver services to JM from cyber attacks
- Assess work environments for health and safety hazards. Eliminate, control, or otherwise mitigate any identified risks
- Monitor and control risks to employees undertaking highly hazardous tasks
- Review working environments to check they align with the appropriate legislation/guidance
- Promote and encourage mental health awareness in the workplace



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We uphold human rights and ethical standards and support the Universal Declaration of Human Rights and the International Labour Organisation (ILO) Core Conventions to ensure no modern slavery exists in our business or throughout our value chain.

We also align with business human rights principles, including the UN Global Compact, UN Guiding Principles on Business and Human Rights and the Organisation for Economic Co-operation and Development (OECD).

We champion equality, diversity and inclusion and make strides to prevent discrimination or abuse – of any kind, to anyone, or for any reason. Our employees have freedom of association, and we actively engage with people to include them in decision-making.

We encourage and support open and honest communications at Johnson Matthey, like speaking up when you see, know of, or suspect something unsafe, unethical, or unlawful. We take any claims of retaliation or discrimination against those who raise concerns in good faith seriously.



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Our **human rights and modern slavery** expectations of suppliers:

- Align your/their operations with the UN Global Compact
- Actively support our commitment to respecting human rights
- Understand and follow the UN Guiding Principles on Business and Human Rights
- Inform JM about any identified material human rights risks and mitigation measures
- Ensure you provide workers with satisfactory working conditions and fair remuneration
- Ensure there is no forced labour, human trafficking, or child labour in your operations
- Respect employees' freedom of association and all other workplace rights
- Encourage and support mechanisms to include employees in decision-making
- Provide a workplace that is free from abuse, harassment, or discrimination of any kind
- Actively demonstrate commitment to workplace equality, diversity, and inclusion
- Establish an environment where employees and others can "speak up" or report concerns confidentially and safely



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We are a global leader in sustainable technologies. Through inspiring science and continued innovation, we are catalysing the net zero transition for millions of people every day. Our technologies and expertise are vital for businesses and communities adapting to climate change challenges.

But, advancing sustainability isn't just about our portfolio of technologies, it's also about our own operations, how we work together and hold ourselves accountable for our impacts on society.

We strive to minimise environmental impact through the products and services we manage through appropriate policies, processes, and certification. We always look to source and use materials responsibly across their whole lifecycle.

Maintaining high health and safety standards is our commitment, and we must ensure we handle all chemicals and materials safely and eliminate or minimise concerning substances throughout our value chain.



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Our sustainability and reducing environmental impact expectations of suppliers:

- Strive to minimise their environmental footprint
- Ensure they have all the relevant environmental permits to operate legally in their jurisdiction
- Have a written and actionable environmental management policy and objectives
- Achieve ISO 14001 certification or equivalent of its manufacturing operations
- Ensure their environmental management system is third-party assured at least once every three years
- Minimise waste and take responsibility for ensuring its clean disposal
- Promote reusing and recycling materials and avoid sending waste to landfills, demonstrating full traceability
- Minimise water use and discharge in operations
- Avoid or reduce air pollution, including nitrogen oxides (NOx), sulphur oxides (SOx), and volatile organic compounds (VOCs)
- Develop a net zero strategy and greenhouse gas (GHG) reduction targets.
- Improve Scope 1, 2 and 3 greenhouse gas emissions, water consumption, and use of recycled materials
 - Record and make related information accessible to JM
- Minimise the environmental impacts of the whole lifecycle of products and services supplied to JM
- Maximise resource efficiency - including manufacturing, raw material purchasing, transportation, disposal, and product use. Also including:
 - Choosing packaging materials with low environmental impact
 - Providing JM with solutions to reuse or recycle all necessary packing material
- Monitor the impacts on local land biodiversity— ideally keeping an actionable and transparent biodiversity action plan
- Ensure all wood is sourced from sustainable forests and carries an internationally recognised woodmark
- Ensure all palm oil comes from sustainable forests and is Roundtable on Sustainable Palm Oil (RSPO) certified or equivalent
- Inform JM, before shipment, of any goods contain or are made with genetically modified organisms (GMOs)
- Seek to choose routes, carriers, and transportation with minimal environmental impact
- Share information that JM can use to calculate transportation carbon emissions on request
- Ensure all on-site materials have clear labels and have Safety Data Sheets (SDSs) accessible to all workers
- Store hazardous and combustible materials in safe, secure, and ventilated areas. Store incompatible materials separately
- Review all internationally recognised restricted substance lists frequently
- Inform JM of any substances in supplied material that are, or may become, prohibited or declarable
- Work transparently with JM to minimise or replace potentially concerning substances used in manufacturing



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We expect everyone who works with JM to 'act with integrity' and uphold the highest standards according to our Code of Ethics.

We counter all forms of bribery and take a zero-tolerance approach to corrupt activities - never offering, giving, or accepting anything of value that could improperly influence business decisions.

Hospitality can be a legitimate way to build business relationships. But we discourage gifts other than company-branded items of modest value and require internal approval for other gifts and hospitality at certain values. We are committed to operating fairly and transparently.

We conduct business in compliance with relevant export control and sanctions legislation and implement our own controls to ensure we obtain the necessary authorisations to operate legally and efficiently.

We adhere to relevant competition and financial crime laws wherever we do business.

Suppliers' and customers' intellectual property rights belong to them, and we safeguard our own. We collect and use personal data responsibly and adhere to all data protection laws whilst operating ethically and transparently.

To safeguard the confidentiality and integrity of any data under our custodianship, we have stringent security measures — just as we do to protect our premises.



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Our business ethics and data protection expectations of suppliers:

- Conduct business in a legal, ethical and fair manner
- Establish and maintain a business conduct and ethics code including (but not limited to):
 - Anti-bribery and corruption
 - Financial crime
 - Fair competition
 - Trade, export controls and sanctions
 - Data protection
 - Conflicts of interest
- Or adopt the standards set out in JM's Code of Ethics
- Understand and comply with antibribery legislation
- Conduct risk-based and proportionate due diligence to detect and prevent corruption
- Exercise extreme care when giving or receiving hospitality with JM representatives or on JM's behalf
- Do not encourage the giving or receiving of gifts beyond reasonable value
- Comply with all relevant export control, sanctions, and customs legislation
- Compete openly and fairly for JM's business
- Ensure you comply with all applicable competition laws where we do business
- Seek to avoid all actual, potential, or perceived conflicts of interest whether that be an individual's own interests or relationships that could inappropriately influence decisions made on JM's behalf
- Notify JM immediately of any instances of said conflict of interest
- Respect JM's intellectual property rights and safeguard them as you would do your own
- Use non-disclosure or confidentiality agreements to protect JM's confidential information
- Be compliant with all applicable local data protection laws when receiving or processing data on behalf of JM
- Keep processing records updated by advising JM of personal data use, handling, or processing changes
- Safeguard the confidentiality and integrity of JM data under its custodianship
- Ensure the availability of JM digital services on an ongoing basis
- Enforce cybersecurity measures for JM resources, technologies, policies, and procedures
- Ensure all parties with JM systems, infrastructure, or data access maintain these security controls to prevent data breaches
- Meet or exceed the international standard ISO 27001:2013 and ISO 27002:2013 code of practice, with relevant certification as proof
- Accept to operate under surveillance when on JM premises. We capture, retain, and dispose of these images in line with national legislation
- Conduct all due diligence to mitigate potential financial crime and sanctions issues
- Invest in local communities through employment opportunities, services, and other work
- Comply with all applicable laws



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We minimise our environmental footprint and conserve mineral resources through our manufacturing choices. Our commitment to sustainability is evident in our supply chain transparency and all efforts to ensure proper material management from high-risk jurisdictions.

We have policies and procedures to manage and monitor our supply chains—addressing risks through due diligence, supplier onboarding, and quality management processes.

We have robust policies and processes to ensure that sourced 3TGs (International legislation defines 'conflict minerals' as tungsten, tantalum, tin, and gold, known as 3TG) and cobalt in our supply chain do not contribute to armed conflict, unethical business practices, or human rights abuses in conflict-affected and high-risk areas (CAHRAs). We ethically source all our critical minerals.

JM PLC and JM Inc are good delivery refiners on the London Platinum and Palladium Markets (LPPM) and Good Delivery lists—engaging in responsible sourcing of platinum group metal-bearing material delivered to us for refining and following the Responsible Platinum and Palladium Guidance (RPPG).

We acknowledge and share societal and political concerns about animal testing, so we are committed to ethical animal protection and seek to reduce, refine, or replace animal testing.



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Our supply chain responsibility and transparency expectations of suppliers:

- Take responsibility for sourcing materials in an ethical and environmentally sustainable manner
- Monitor and perform appropriate due diligence on their own suppliers, ensuring adherence to the policies outlined in this code
- Have a written material sourcing policy aligned with the Organisation for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs (OECD Guidelines). [Learn more](#)
- Understand and comply with all applicable conflict minerals laws and regulations
- Conduct 3TG sourcing by policy commitments in JM's Global Conflict Minerals and Cobalt Policy
- Ensure the validation of 3TG sourcing practices by a recognised third-party audit programme (e.g., Responsible Minerals Assurance Process RMAP) and provide JM with annual evidence. [Learn more](#)
- Provide JM with an audit trail of the origin of raw materials containing nickel, cobalt, and lithium
- Ensure the assessment of independent lithium, cobalt, and nickel suppliers by the OECD Guidelines. [Learn more](#)
- Provide information on the country of origin of other critical metals and industrial minerals. (More information is in the Responsible Minerals Initiative). [Learn more](#)
- Provide JM with back-to-origin transparency for all materials supplied containing platinum group metals.
- Align with our Platinum and Palladium Supply Chain Policy Statement.
- Only undertake or commission animal testing when required to meet prevailing regulatory obligations. Such testing will be performed by the current OECD Testing Guidelines or equivalent. [Learn more](#)



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- [JM Code of Ethics and Speak up](#)
- Visit our [Sustainability governance webpage](#) to access all JM policies, position statements, and disclosures, including our CEO commitment statement on UN Global Compact



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