



Johnson Matthey North America
Conflict Free Minerals Policy

Johnson Matthey N.A. (“JMNA”) supports the principles set out within the United Nations Universal Declaration of Human Rights (the “UN Declaration”). In accordance with JMNA’s support of such principles, JMNA will endeavor to monitor human rights violations, such as has been reported to be occurring in the eastern Democratic Republic of the Congo (“DRC”), and the role of conflict minerals in financing such violations. Activities that support armed groups and human rights violations in the DRC are unacceptable under the UN Declaration. JMNA fully supports efforts to stop human rights violations in the DRC by requiring transparency of all conflict mineral sourcing from the DRC and its adjoining countries.

As a leader in the precious metals industry, JMNA recognizes the unique opportunity we have to play a leading role in the development and implementation of a system designed to detect and prevent commercial activities that contribute to the financing of armed groups and human rights violations.

It is JMNA’s policy to not transact business with any counterparties that may directly or indirectly finance or benefit armed groups in the DRC and its adjoining countries through the exploitation and trade of conflict minerals that have the effect of furthering human rights violations. JMNA commits to take a leading role in working with our industry and commercial partners in finding viable solutions to this important issue. JMNA will work with our supply chain to ensure our suppliers of minerals are aware of our policy and will urge our suppliers to support such policy, including by sourcing minerals we use from socially responsible sources.

APPROVED AND ADOPTED BY THE JOHNSON MATTHEY NORTH AMERICA COMPLIANCE AND EXECUTIVE COMMITTEE AT A MEETING HELD MARCH 15, 2011.

Handwritten signature of Alan M. Myers in cursive script.

Alan M. Myers
Chairman

Handwritten signature of Robert M. Talley in cursive script.

Robert M. Talley
Secretary