Implementing a Code of Ethics Globally: Overcoming the Hurdles to Win the Race

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Objectives

• Introduce you to Johnson Matthey

• Share how we created and launched our first global Code of Ethics – ‘Doing the Right Thing’ in late 2015

• Provide an overview of the Code’s support structures and how they helped us jump over the “hurdles”

• Outline why and how we moved to using online training to support Ethics and Compliance

• Most importantly, what has happened as a result
Our vision is for a world that’s cleaner and healthier; today and for future generations

How did we create JM’s first global Code of Ethics?

• It started with a false start...

• Values based approach

• Getting ‘on brand’

• Get an external perspective

• Reach out to Subject Matter Experts

• With help from our Ethics Ambassadors
Our Ethics Ambassadors

Communication is key

- Doing the Right Thing
- Das Richtige tun
- सही कार्य करना
- Fazer a coisa certa
- Принцип «Поступать правильно»
- 올바른 일을 하는 것
- Właściwe postępowanie
- لا تتوالى النمو
- القيام بالعمل الصحيح
- Oikein toimiminen
- Agir comme il se doit
- 做正确的事
- 正しい事を実行する
- Поступане правильно
- Att göra det rätta
- Haciendo lo correcto
- योग्य काम करणे
- Fazendo o que é certo
- Buat Apa Yang Betul
- Faire ce qu’il faut
- Fare la Cosa Giusta
Highlights of our Code

Robert MacLeod
Chief Executive Officer

Asking for help and speaking up when I have concerns
Understanding and following the principles in the Code
Working safely and respecting the rights of others

Protecting Johnson Matthey’s brand, assets and reputation
Supporting Johnson Matthey’s ambition to build a sustainable business
Doing business responsibly, fairly and legally
Highlights of our Code

Warning Signs - Something may be wrong if you hear:

- No one will ever know.
- We have no choice.
- It sounds too good to be true.
- Everybody does it.
- It's all for a good cause.
- This will destroy the competition.
- What's in it for me?
- Just shred the document.
- No one will get hurt.

Ethical Decision Making

To help guide you in your decision making, we have included a flow chart process that you can use when you are not sure what the right thing to do is or to test a decision you have made. Use this process to help you do the right thing.

Part 1: Framing an issue and deciding what to do

What should I do?

Consequence: What are the possible consequences of this decision?
- What are the ethical implications?
- What are the legal implications?
- What are the environmental implications?
- What are the social implications?

Call for the situation or ethical dilemma:
- Do I know who I am?
- Do I know what I believe?
- Do I know what I stand for?
- Do I know what I value?

If yes, proceed to step 3; if no, return to step 1 and reevaluate.

Part 2: Make your decision

Consider your options:
- What are my alternatives?
- What are my best options?
- What are the risks involved?
- What are the benefits involved?

Seek advice from others:
- Who can I trust to give me good advice?
- Who is knowledgeable in this area?
- Who has experience in this area?

If yes, proceed to step 3; if no, return to step 1 and reevaluate.
Highlights of our Code

• Your manager
• Human Resources, Legal, Ethics and Compliance
• Other Group functions
• Ethics Ambassadors
• Speak Up line - [Website Address]
Going online – Why we created a training module
Calling in the reinforcements

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Taking the right approach

Specific challenges:

• Embrace the visual identity of the Code

• Lift the words off the page

• 13,000 learners, 42 countries, 19 languages

• Multi-vendor environment
The finished article, or rather, course

How has the course been received? What was the impact?

Between 2010 and Sept 2015, 86 whistleblowing reports were made

In the first year of the Code of Ethics, from September 2015, there were 75 Speak Ups raised

In the second year, there were 103 new Speak Ups
Across 22 languages, the Code has been downloaded from ethics.johnsonmatthey.com over **13,000** times

In 2017 year, the Code of Ethics online training module was completed by **over 10,500** staff worldwide
We have over 100 Ethics Ambassadors across 24 countries

Looking to the future

Johnson Matthey
Inspiring science, enhancing life
Thank you for your time today
We would like to welcome any questions you may have