

# Position on Human Rights

## Background

While it is the duty of governments to protect human rights, businesses have a responsibility to respect human rights in their own operations and business relationships. The [United Nations Guiding Principles on Business and Human Rights \(UNGPs\)](#) outline the expectations of businesses to avoid infringing on human rights and to take steps to address adverse human rights impacts with which they are connected<sup>1</sup>.

## Relevance

Johnson & Johnson believes that healthy lives and thriving communities can only be achieved when all people are treated with dignity and respect.

Our Position on Human Rights, first developed in 2012, sets out our commitment to respecting internationally recognized human rights in our own operations and across our value chain, as provided in the International Bill of Human Rights<sup>2</sup> and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. Our approach is further guided by the UNGPs and the [Organization for Economic Cooperation and Development Guidelines for Multinational Enterprises](#).

We are committed to complying with the laws of the countries in which we do business, and we are informed by international human rights standards. In cases where national law is less stringent than international human rights standards, we strive to uphold the international standard to the extent possible.

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<sup>1</sup> <https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr.en.pdf>

<sup>2</sup> Comprised of the [Universal Declaration of Human Rights](#), the [International Covenant on Civil and Political Rights](#) and the [International Covenant on Economic, Social and Cultural Rights](#)

We expect our employees and business partners—including our suppliers and customers—to share our commitment to respecting human rights. All suppliers shall comply with our [Responsibility Standards for Suppliers](#), which set forth our expectations around business practices, including on human rights.

## Guiding principles

Guided by [Our Credo](#) values, we strive to respect and promote human rights across our operations, through our business relationships and in our local communities—from the people who source and create the materials we use and those who support us to develop, manufacture and distribute our products to the doctors, nurses and patients that we serve.

## Our position

### Governance

Our Enterprise Human Rights Governance Council (EHRGC) leads our global approach to human rights due diligence and management. EHRGC members are senior leaders representing key functions across our business, including Human Resources, Procurement, Office of the Chief Medical Officer, Commercial Representation, Government Affairs and Policy, Legal, Corporate Affairs and the Enterprise ESG Program Office. The EHRGC coordinates with other governance bodies that have relevance to our approach to human rights.

Two members of the Johnson & Johnson Executive Committee—the Executive Vice President, Chief Human Resources Officer; and the Executive Vice President, Chief Technical Operations & Risk Officer—serve as executive sponsors of our human rights program and provide executive support and oversight. The Regulatory Compliance & Sustainability Committee of the Johnson & Johnson Board of Directors provides oversight of management’s approach to human rights.

### Approach

**Due diligence:** We have due diligence processes and management systems in place across our business to identify and address potential and actual human rights impacts. We recognize that human rights due diligence is a process of continuous improvement, and we review and refine our approach on an ongoing basis.

**Stakeholder engagement:** We engage with a range of internal and external stakeholders in our due diligence processes to identify and address potential and actual human rights impacts, and include consideration of rightsholders that are potentially more vulnerable to human rights impacts.

**Capability building:** Every Johnson & Johnson employee has a role to play in delivering on our commitment to respect human rights. All new and current employees are required to complete biannual Code of Business Conduct training, which covers human rights themes. In addition, employees with roles and responsibilities relevant to aspects of human rights in our operations or in the supply base regularly receive general awareness trainings on human rights.

**Raising concerns:** The Johnson & Johnson [Our Credo Integrity Line](#) provides a global, accessible channel for reporting concerns and is available 24 hours a day, 7 days a week, and in 24 languages. It is independent, secure and confidential, offering a safe mechanism for anonymous reporting (where permitted by local law) of suspected concerns or potential violations of our policies or the law. We do not tolerate threats or acts of retaliation in any circumstance. We communicate the Our Credo Integrity Line so that employees and other stakeholders such as workers in our supply base can access this channel to raise grievances at any time.

**Remedy:** We are committed to providing effective resolution where we have caused or contributed to adverse human rights impacts. Where we find adverse human rights impacts directly linked to our business relationships, we use our influence to encourage our suppliers or business partners to prevent, mitigate and address those harms. We engage in activities to confirm supplier conformance to our human rights expectations and conformance to our Responsibility Standards for Suppliers, and may disqualify any potential supplier or terminate any relationship with a current supplier that has failed to conform.

## Priority focus areas

In line with the UNGPs, we focus our efforts where there may be potential or actual risk of adverse human rights impacts linked to Johnson & Johnson activities and business relationships. We conduct enterprise-level human rights risk assessments and prioritization, internal and external stakeholder engagement, and ongoing due diligence to identify human rights priority focus areas that are aligned to four thematic areas:

1. Fair working conditions
2. Access to healthcare

3. Safe, effective products
4. Sustainable environment

## 1. Fair working conditions

We believe in upholding our employees' rights as individuals in the workplace and providing fair working conditions in which they can thrive and prosper. We expect suppliers to Johnson & Johnson to share our commitment to fair working conditions, as outlined in our [Position on Responsible Supply Base](#) and the [Responsibility Standards for Suppliers](#).

### Modern slavery

We prohibit the use of forced, bonded or compulsory labor; human trafficking and involuntary prison labor. See our [Anti-Human Trafficking Policy](#) and our [Position on Employment and Labor Rights](#).

### Child labor and young workers

We support the right of children to a childhood free of work responsibilities. We prohibit the employment of young persons (under the age of 18) anywhere in our business, other than in compliance with ILO Conventions 138 and 182 and all applicable laws and regulations concerning age, hours, compensation, health and safety. See our [Employment of Young Persons Policy](#) and our [Position on Employment and Labor Rights](#).

### Freedom of association and collective bargaining

We respect each worker's right to make an informed decision, free of coercion, about membership in associations and/or labor unions. Workers have the right to organize or join associations, and to bargain collectively, if they so choose. Johnson & Johnson and its operating companies are required to bargain in good faith with these associations. See our [Position on Employment and Labor Rights](#).

### Working hours and compensation

We comply with all applicable laws and collective agreements including those relating to working hours, overtime, maximum hour rules, meal and rest periods and paid leave. Overtime work is voluntary with recognition of business needs and due care for the health and safety of workers. Overtime is compensated at a premium rate in line with the law as a minimum standard. See our [Position on Employment and Labor Rights](#) and our [Position on Employee Development and Total Health and Well-Being](#).

### **Discrimination**

We base employment decisions on merit, considering qualifications, skills and achievements. We prohibit discrimination against any employee or applicant for employment. See our [Position on Providing a Discrimination-Free Workplace](#).

### **Harassment**

All people have a right to work in an environment free from the demoralizing effects of harassment, and of offensive and improper conduct. We do not tolerate harassment, bullying or conduct that could lead or contribute to harassment of employees by managers, supervisors or co-workers. This also extends to conduct that takes place off Company premises (including on social media) that could reasonably impact employees or others within our workplace. See our [Position on Providing a Safe and Harassment-Free Workplace](#).

### **Safe and healthy work environment**

We are committed to creating safe and healthy places for people to live, work and thrive. This includes our practices that protect environmental health and safety for the people in and around our workplaces. See our [Environmental Health and Safety Policy](#), our [Position on Environmental Health and Safety Management](#), and our [Position on Employee Development and Total Health and Well-Being](#).

## **2. Access to healthcare**

Access to healthcare is a multi-dimensional issue that requires strong engagement and collaboration among various stakeholders in the health community, as well as tailored, context-specific approaches grounded in local needs. While governments have the primary responsibility for establishing and advancing health systems to meet their populations' needs, healthcare companies serve an important role as well.

We support everyone's right to health and believe that everyone should have access to quality and affordable healthcare, regardless of where they live. Through focus and collaboration with other stakeholders, we aim to advance sustainable patient access to medicines and medical solutions that save and improve lives, cure patients, and prevent disease for those in need. We strive to achieve broad and timely access to our medical products at sustainable prices that aim to be locally

affordable and remain dedicated to paving the way to a healthier future for all.

### **3. Safe, effective products**

We recognize our fundamental responsibility is to provide patients, consumers and healthcare providers with products that are as effective and safe as possible at every stage of product development, manufacturing, supply chain and commercialization. We take an evidence- and science-based, ethics- and values-driven approach to medical safety, putting patient and consumer well-being first and foremost in our decision-making and actions, with an emphasis on transparency. See our [Position on Patient Safety](#).

Counterfeit medicines—products designed, dressed, branded, and/or packaged in a manner intended to be indistinguishable from that of the genuine original and not manufactured and/or distributed with the authorization of the legal brand owner—are a serious global health issue. We are committed to engaging with governments and intergovernmental organizations to identify and mitigate the risks of counterfeit healthcare products and strive to ensure that all who use our products have confidence in their quality, safety and authenticity. See our [Position on Counterfeit Healthcare Products](#).

### **4. Sustainable environment**

As a leader in the healthcare industry, we know that human health is inextricably linked to the health of the planet and that poor environmental health can impact human rights.

We believe everyone deserves access to a clean, healthy and sustainable environment. We continually strive to improve the environmental footprint of our operations, our products and value chain, while also conducting ongoing environmental due diligence and working to integrate human rights considerations into our environmental policies and programs. See our [Position on Climate Action](#), our [Position on Environmental Stewardship](#) and our [Position on Pharmaceuticals in the Environment](#).

## **Reporting and disclosure**

We periodically review and update our Position on Human Rights to ensure it reflects our enterprise-wide approach to human rights as well as evolving external expectations.

## Johnson & Johnson Position on Human Rights

We publicly report progress on our approach to human rights through our annual [Health for Humanity Report](#). We also publish legally required disclosures such as our annual [Global Modern Slavery Statement](#) and our [Position on Conflict Minerals](#).

## Application

This Position is relevant for the Johnson & Johnson Family of Companies, as detailed in our [governance materials](#).

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