

# Johnson & Johnson's Ethical Sales & Marketing Practices

At Johnson & Johnson, we are committed to responsible, ethical and patient-centered sales and marketing practices for our Consumer, Pharmaceutical and Medical Devices products and services. Our sales and marketing efforts seek to accurately inform health decisions and consumer choices.

Our Credo guides all Johnson & Johnson employees to put the needs and well-being of the people we serve first, and to act justly, ethically and with integrity. We strive to operate with the highest standards of business conduct and transparency through all communications with patients, consumers, healthcare professionals (HCPs) and other stakeholders.

## **Our Standards**

Our sales and marketing practices are governed by the Johnson & Johnson [Code of Business Conduct](#), our U.S. Healthcare Consolidated Guidance, our Johnson & Johnson International Health Care Business Integrity Guide (HCBIG), our [Statement on Responsible Interactions with Healthcare Professionals](#), relevant external laws, regulations, and industry codes and guidelines.

As outlined in the Johnson & Johnson Code of Business Conduct, we aspire to bring the highest standards and level of integrity to our sales and marketing activities by following all laws and regulations regarding the promotion, marketing and sales of our products, including ensuring that what we say is truthful, not misleading, and is consistent with regulatory approvals for our products. All Johnson & Johnson operating companies follow internal guidelines for promotional communication, which are regulated through strong internal review processes. All promotional materials used must be consistent with the currently approved product information (label and instructions for use) in a country of operation, and must be periodically reviewed and updated if new scientific evidence becomes available.

Johnson & Johnson operating companies interact with healthcare professionals (HCPs) for a wide variety of reasons including product consulting, promotional speaking, product development, clinical research and educational events. Our guidelines and policies are designed to ensure that HCP interactions take place in a compliant and transparent way. Rules for interactions with HCPs that involve the exchange of anything of value require that:

- Services must fulfill a legitimate, documented business need;

- Services must be provided based on qualifications, experience, special knowledge or capabilities;
- Any compensation must be based on fair market value;
- Payment or funding must never be based on the current or anticipated future purchasing or prescribing of Johnson & Johnson products;
- Reimbursement for travel, lodging and meal expenses must be reasonable, documented and in line with Johnson & Johnson's travel and entertainment policy;
- Locations where interactions with HCPs occur should be conducive to the exchange of business or scientific information;
- Johnson & Johnson operating companies must not provide recreation or entertainment to HCPs, such as attendance at sporting events;
- Meals and refreshments to HCPs must be modest in value and not a focal point of the meeting;
- Proper documentation is required for all services.

In addition to our internal standards, a broad range of industry guidelines and regulatory laws in the countries where we operate govern the wide variety of scientific, sales, promotional and marketing arrangements with both public and private entities and individuals, including HCPs. These include:

- The Advanced Medical Technology Association Code of Ethics on Interactions with Health Care Professionals;
- The Pharmaceutical Research and Manufacturers of America Code on Interactions with Healthcare Professionals;
- The PhRMA Guiding Principles on Direct-to-Consumer Advertisements About Prescription Medicines.
- The International Federation of Pharmaceutical Manufacturers of America Code of Practice;
- Volunteer codes and guidelines of the Consumer Healthcare Products Association; and
- Other similar trade association codes around the world.



Our approach to ethical sales and marketing extends to third parties. Due diligence and background checks are regularly conducted on third-party intermediaries to help ensure compliance with our policies and standards. The contracts with intermediaries include requirements that intermediaries must abide by when interacting with customers on our behalf, including among others: compliance with applicable anticorruption laws and the policies contained in our HCBIG; agreement to certify compliance periodically at our request; and agreement to allow auditing of their activities by Johnson & Johnson.

We monitor and enforce compliance with these internal and external standards for sales and marketing through our global compliance program. For more information, visit the 2017 Health for Humanity Report's Business Ethics section.

### **Sales Training**

Johnson & Johnson provides sales representatives with ongoing scientific training and product knowledge. We require our sales representatives and third-party intermediaries to be familiar with the Johnson & Johnson Healthcare Consolidated Guidance, the Johnson & Johnson International HCBIG and all applicable laws, regulations, and industry codes. For each product promoted, the sales representative must have the most recent product information, as approved by the appropriate internal and external authorities. Outdated material must be identified and marked as obsolete and destroyed.

All employees, including sales representatives, Medical Science Liaisons and their respective managers are properly trained on the reporting of complaints and adverse events relating to company products. Employees are required to promptly transmit to their respective Johnson & Johnson operating company all adverse events and incidents.

### **Scientific Exchange**

To remain informed about and up-to-date with latest advances in scientific and medical research, we participate in various scientific events and forums. A Johnson & Johnson operating company may sponsor or organize congresses, symposia and other educational meetings that are primarily intended to support the dissemination and exchange of scientific and medical information.

These events may be organized by third parties or, where permitted under applicable laws and codes of conduct, directly by a Johnson & Johnson operating company. Sponsorship of such activities may consist of financial, scientific, technical, organizational, and/or logistical support. In instances where a Johnson

& Johnson operating company is the sole sponsor or is directly organizing the event, these events must be organized for scientific exchange and not with the primary goal of promoting company products.

Where consistent with local law and applicable codes of conduct, a Johnson & Johnson operating company may provide or pay for travel, hotel, meals, and fees for HCPs to attend third-party or company-sponsored congresses or symposia. However, support for attendance must not be conditioned upon any agreement or promise to prescribe or purchase any Johnson & Johnson products, and must meet Johnson & Johnson travel and expense policy limitations. The Johnson & Johnson operating company must document its selection criteria for supporting any HCPs to attend a third-party educational event. Selection criteria must be based on the educational need of the HCP or the HCP's institution, not on the potential to influence prescribing behavior. Additional details can be found in [Funding for Professional Education and to Health Care Professionals Statement](#).

### **Direct-to-Consumer Marketing**

We believe direct-to-consumer (DTC) advertising contributes to greater awareness about conditions and diseases, which can benefit public health by increasing the number of patients appropriately diagnosed and treated.

We require our employees to follow industry guidelines on advertising medicines and medical devices to ensure our product advertising and communications are helpful to people and doctors and give them full information about the benefits and the risks of our products. Our communications are developed to comply with local laws and regulations; in countries where DTC advertising is not permitted, for example, we forbid it in our communications.

### **Packaging & Labeling Standards**

Products developed and commercialized through our Pharmaceutical and Medical Devices businesses meet all applicable laws regarding package inserts, which contain appropriate information for health care professionals and patients. For over-the-counter pharmaceutical products, packaging and inserts are likewise used to communicate with consumers. Our Consumer products include clear, easy-to-read instructions and information on how to use our products appropriately. Ingredients are listed for all products; however, we do not include sourcing information of components. Directions for proper disposal are included where necessary.

*Last updated: January 2019*