

Position on Conflict Minerals

Background

In recognition of the link between the global minerals trade and the financing of armed groups in the Democratic Republic of Congo and adjoining countries (DRC region), the United States Congress passed Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 requiring companies to publicly report on their use and the source of these minerals. In August 2012, the United States Securities and Exchange Commission (SEC) adopted a final rule under the Securities Exchange Act of 1934, Rule 13(p)-1, requiring SEC-reporting companies that manufacture or contract to manufacture products that contain “conflict minerals” to conduct due diligence on the origin, source and chain of custody of such minerals and provide specialized disclosure regarding the findings of such diligence. The SEC defines “conflict minerals” to include tin, tungsten, tantalum and gold (3TG).

Relevance

As the world’s largest and most broadly based healthcare company, Johnson & Johnson aims to conduct its business in a way that upholds human rights, including the work that we do with external partners throughout our supply chain. Along with governments, non-governmental organizations, the investment community and other corporations, Johnson & Johnson is concerned with human rights violations reported to occur in the DRC region as a result of the civil discord fueled by armed groups directly or indirectly financed by the mining of and trade in the ores from which conflict minerals are derived.

The 3TG minerals are essential in the manufacture of a variety of electronic and medical devices and other products, including certain products manufactured by the Johnson & Johnson Family of Companies. These may include, for example, a small number of our pharmaceutical or consumer health products that contain electronic components, including pharmaceutical diagnostics products and consumer plug-in and/or battery-operated devices, and medical devices that contain metal alloys and electronic components such as orthopaedic, trauma and spine products and sterilization and disinfection products, among others.

Guiding Principles

As stated in [Our Credo](#): “We are responsible to the communities in which we live and work and to the world community as well. We must be good citizens ...”

Our commitment to respecting human rights across our value chain—from our own employees to our supply base to the communities in which we live and work—is articulated in the Johnson & Johnson [Code of Business Conduct](#).

Further, our commitment is guided by authoritative standards such as the United Nations Guiding Principles on Business and Human Rights and as a signatory to the UN Global Compact’s 10 Principles. For example,

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and **Principle 2:** Make sure that they are not complicit in human rights abuses.¹

Our Position

We are committed to conducting our business worldwide with respect for human rights. Our [Position on Human Rights](#) and our [Responsibility Standards for Suppliers](#) guide our actions with respect to upholding human rights throughout our value chain. Specifically, with regard to 3TG, we support government and industry efforts to eliminate human rights abuses in 3TG sourcing. Our approach includes:

Detecting and eliminating 3TG sources in our supply chain: We work to eliminate 3TG in our products that we discover originate in the DRC region and support armed groups. We are committed to instituting procedures and reporting systems, and to conducting the necessary diligence to comply with Rule 13(p)-1. Specifically, we use a documented reasonable due diligence process, as suggested by the Organization for Economic Cooperation and Development (OECD) guidelines, to determine the use, country of origin and source of 3TG minerals in our global product portfolio across our Consumer Health, Medical Devices and Pharmaceutical businesses. Our engagement of suppliers includes the following:

- We instruct our suppliers to source materials from suppliers who also source responsibly, including from legitimate, conflict-free mines in the DRC region.
- We require all our 3TG suppliers to conduct the necessary due diligence and provide proper verification of the country of origin and source of the materials used in the products they supply to Johnson & Johnson operating companies.
- We support initiatives to verify smelters and refiners that are conflict-free, and expect our suppliers to utilize any such conflict-free smelter/refiner programs that are available.
- We reserve the right to verify any information received from our suppliers.
- In cases where it is found that a supplier is not in compliance with our requirements regarding 3TG, we instruct the supplier to develop, implement and document plans to remedy such non-compliance in a timely manner. If the non-compliance cannot be resolved, we reserve the right to terminate the relationship with the supplier.

Compliance with disclosure requirements relating to 3TG: We disclose information relating to conflict minerals annually. Please see the [SEC Filings \(Form SD\) on our Investor webpage](#) for our latest annual Conflict Minerals Report.

Supporting industry efforts to eliminate conflict minerals: We engage with others in our industry and other industries to promote conflict-free minerals sourcing. For example, Johnson & Johnson is a member of the Responsible Minerals Initiative, a cross-industry organization that provides resources, tools and information to help companies source conflict-free minerals.

¹ <https://www.unglobalcompact.org/what-is-gc/mission/principles>

Application

This position is relevant for the Johnson & Johnson Family of Companies, as detailed in our [governance materials](#). We provide updates, where relevant, relating to conflict minerals in our annual [Health for Humanity Report](#).

Last Updated: June 2020