

# Position on Human Rights

## Commitment

At Johnson & Johnson, we are guided and sustained by [Our Credo](#), a set of core principles that serve as a moral compass for how we conduct business. These principles outline our obligations to our customers, our employees, our communities around the world, and our shareholders; they also unite our employees with a common value that the fundamental rights and dignity of all people must be respected.

While it is the duty of governments to protect the rights of their citizens, we recognize that businesses also have a critical role to play. As a global healthcare company, Johnson & Johnson is committed to respecting human rights in our own operations and complying with the laws of the countries in which we do business. Moreover, we believe we have an opportunity to positively impact the promotion of human rights. To this end, along with our trade organization and industry alliance partners, we encourage and support our suppliers and other business partners in their efforts to act in accordance with internationally recognized human rights standards.

Our commitment is guided by the principles set forth in the following international documents:

- *Universal Declaration of Human Rights*
- *International Covenant on Civil and Political Rights*
- *International Covenant on Economic, Social and Cultural Rights*
- *International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work*
- *Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises*
- *United Nations (UN) Guiding Principles on Business and Human Rights*

Johnson & Johnson is also a signatory of the [UN Global Compact](#), and supports the 10 principles set out in this framework on human rights, labor, environment and anti-corruption.

## Approach

Our commitment to respecting and promoting human rights applies to all Johnson & Johnson locations, operating companies and business operations worldwide. We recognize that human rights due diligence is a continuous process, and we have policies, processes, training and management systems in place in furtherance of this commitment.

### In Our Operations

We expect each Johnson & Johnson employee to act lawfully toward other employees, colleagues, business partners and those in local communities as outlined in our [Code of Business Conduct](#) and other related enterprise-wide policies. We ensure respect of Johnson & Johnson employee rights and entitlements through policies and procedures established by the global Human Resources, Procurement and Law Department

functions. All new and current employees are required to complete biannual Code of Business Conduct trainings, which cover human rights topics. Employees with roles and responsibilities relevant to aspects of human rights in our operations or in the supply base receive general awareness trainings on human rights.

### **In the Supply Base**

We expect our business partners—including suppliers and customers—to share our commitment to respect human rights. All suppliers shall comply with our [Responsibility Standards for Suppliers](#) (the Standards), which set forth our requirements around business practices. Processes are in place to identify and manage human rights risks associated with our supply base. We have also established due diligence processes to assess and monitor compliance of our suppliers with labor, employment, environmental and business ethics provisions of the Standards.

### **In the Community**

We respect the rights of local communities—and of those who live and work within them—and adhere to international human rights standards. We continuously monitor and address the environmental impacts of our business operations on our neighbors, and strive to create positive impacts on adjacent communities through local engagement and charitable programs. See our [Climate Policy](#), [Position on Human Health and the Environment](#), [Position on the Human Right to Water](#) and [Position on Respecting Biodiversity](#).

## **General Rights and Obligations**

### **Fair Labor Practices**

All employment must be in full compliance with all applicable laws and regulations, including those concerning hours, compensation, opportunity and working conditions. Our operating companies are required to respect each employee's right to make an informed decision, free of coercion, about membership in associations and/or labor unions. Employees have the right to organize or join associations, and to bargain collectively, if they so choose. The Company and its operating companies are required to bargain in good faith with these associations. See our [Position on Employee Compensation and Benefits](#) and our [Position on Freedom of Association](#).

### **Forced Labor and Human Trafficking**

We do not accept or condone any aspect of forced or compulsory labor. We strictly prohibit our employees, suppliers and other business partners from engaging in human trafficking-related activities. See our [Position on Employment and Labor Rights](#) and [Anti-Human Trafficking Policy](#).

### **Child Labor and Young Workers**

We support, follow and comply with child labor laws across our operations and value chain. Our approach is consistent with the ILO labor standards outlined in ILO Conventions No. 138 and 182. See our [Employment of Young Persons Policy](#).

### **Non-Discrimination and Anti-Harassment**

We base employment decisions on merit, considering qualifications, skills and achievements. We do not tolerate discrimination or harassment. See our [Position on Providing a Safe and Harassment-Free Workplace](#) and [Position on Providing a Discrimination-Free Workplace](#).

### **Safe and Healthy Work Environment**

It is the policy of Johnson & Johnson that all employees work in a clean, orderly and safe environment. In the interest of maintaining a safe and healthy workplace, the Company requires full compliance with applicable workplace safety and industrial hygiene standards, as mandated by law. See our [Position on Employment](#)

[and Labor Rights](#), [Position on Environmental Health and Safety Management](#) and [Position on Employee Health and Well-Being](#).

### **Privacy**

We are committed to protecting the privacy of those who entrust us with their personal information, including our customers, consumers, website visitors, employees, clinical research participants and all those who do business with us. Whenever possible, we explain how personal information can be corrected, updated or deleted. We keep personal information secure. See our [Position on Data Privacy](#).

## **Sector-Specific Opportunities**

### **Access to Healthcare**

Access to healthcare, including access to innovative medicines, vaccines, devices and other technologies, is a critically important focus for the global health community and our Company. At Johnson & Johnson, we believe one of the most significant opportunities we have is to improve access to healthcare.

Access to healthcare is a complex multi-dimensional issue that requires strong engagement and collaboration among various stakeholders in the health community, as well as tailored context-specific approaches based on local needs. While governments have the primary responsibility, healthcare companies serve an important role as well. We believe that as a manufacturer of healthcare products and solutions, our critical contribution lies in continuing to invest in discovery and development of lifesaving treatments to address the world's most intractable health challenges. We also recognize our responsibility to ensure the quality and safety of our products from the discovery phase to clinical trials and to post-commercialization.

In addition, we contribute to strengthening the healthcare systems around the world through our efforts to improve the capacity of health workers, and we advocate for sustainable universal health coverage solutions. We work to price our products responsibly to ensure that they reflect their medical value, and we implement programs to make our medicines more accessible and affordable in low-resource settings. For more information on our approach on access to healthcare, see our [Health for Humanity Report](#).

### **Intellectual Property**

At Johnson & Johnson, we believe intellectual property (IP) encourages and promotes innovation—innovation that leads to the creation of products that profoundly change and save patients' lives. The IP system provides a framework that allows us to invest in new technologies, fund research and development, and ultimately bring new transformational medicines to the market.

IP protections are the foundation of a system that has developed important new treatments for patients in need, including those for HIV, tuberculosis and other diseases that have the greatest impact on developing countries. To promote access to these medicines, we work closely with governments, non-governmental organizations, and other stakeholders around the world. Johnson & Johnson facilitates access through equity-based tiered pricing, healthcare system capacity-building, patient assistance programs and voluntary licensing arrangements. We believe that these mechanisms are effective in providing access while also promoting an IP framework that enables the development of new treatments for patients. See our [Position on Intellectual Property](#).

### **Clinical Research Ethics**

Patient welfare is our top priority, including the safety of clinical trial participants. Our clinical trials are conducted based on internal policies that are designed to respect the rights of participants. We also adhere to

external standards and guidelines, such as the [Good Clinical Practice Guidelines of the International Conference on Harmonization](#), the [World Medical Association Declaration of Helsinki](#) and [the Belmont Report](#).

We are committed to ensuring that our clinical trials around the world meet the laws and regulations of health authorities. We have procedures in place to fully inform participants of potential benefits and risks, to protect the confidentiality of their personal information, and to protect vulnerable populations. We do not discriminate in the conduct of our clinical trials, and seek to ensure access to our products in the communities where we develop them. All external research organizations conducting trials on our behalf are expected to follow our standards. We have processes in place to monitor adherence to our policies and practices.

We believe transparency of clinical trial data advances science and medicine and is in the best interest of the patients who use our products and the providers who prescribe them, and of researchers who may be able to use our data to further their research. We therefore support the overall principles of greater clinical trial data transparency, including registration of clinical trials and disclosure of their results in external registries, publication of results in peer-reviewed journals, and sharing of clinical study reports and participant-level data from clinical trials. See our [Position on Clinical Trial Data Transparency](#), [Ethical Code for the Conduct of Research and Development](#) and [Position on the Conduct of Clinical Trials](#).

## Grievance Mechanisms and Remediation

We are committed to providing effective resolution where we have caused or contributed to adverse human rights impacts. Where we find impacts directly linked to our business relationships, we will use our influence to encourage our suppliers or business partners to prevent, mitigate and address adverse impacts on human rights. 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 communicate the Our Credo Integrity Line access broadly, so that employees and others who work with us know this channel exists for them to raise grievances at any time. We will not tolerate threats or acts of retaliation in any circumstance. See our [Position on Resolving Employee Grievances](#).

## Governance

At Johnson & Johnson, every employee is responsible for respecting human rights. The Enterprise Governance Council (EGC), a global, cross-functional team of senior leaders representing functional groups and three business segments, oversees our enterprise-wide human rights due diligence program. Quarterly EGC meetings provide a forum for updates on human rights topics, with an established process for elevating issues to the Johnson & Johnson Executive Committee, our Board of Directors and Board Committees if warranted. Two members of the Executive Committee, the Chief Human Resources Officer and the Chief Supply Chain Officer serve as executive sponsors for our human rights due diligence program, providing executive support and oversight. The Enterprise Human Rights Governance Council that reports directly to the EGC is a team of experts representing main Enterprise functions responsible for various aspects of human rights due diligence and management across our own operations and the supply base, including Supply Chain, Human Resources, Procurement, Law Department, Enterprise ESG Program Office, Government Affairs & Policy, and Enterprise Sustainability.

We strive to routinely review and refine our approach to addressing human rights. Our Human Rights Statement was first developed in 2012 with input from several external experts. Updates to the 2021 version of the document were made with extensive input from key internal stakeholders across various Enterprise functions. We track and publicly report on human rights progress through our annual [Health for Humanity Report](#).

*Last Updated: May 2022*