

# Position on Providing a Safe and Harassment-Free Workplace

## Background

Harassment, including sexual harassment, occurring in the workplace is unacceptable behavior that can cause great personal and professional harm to individuals and create an atmosphere that damages a company's ability to perform effectively.

Harassment includes sexual harassment and harassment based on non-work-related personal characteristics.

Sexual harassment is inappropriate conduct that may include a range of subtle and not-so-subtle behavior and may involve individuals of the same or different genders. It includes harassment that is gender-based (for example, offensive remarks about an individual's dress, body or appearance, or an individual's sex or gender), as well as conduct that is sexual in nature. Examples of prohibited sexual harassment include, but are not limited to:

- unwelcome sexual advances;
- requests for sexual favors;
- leering;
- unwelcome touching;
- blocking normal movement to trap, intimidate, or cause physical contact or discomfort;
- sexually explicit e-mails, texts, voicemails or other forms of communication;
- verbal or physical conduct of a sexual or offensive nature, such as uninvited touching of a sexual nature;
- sexually related jokes and comments or innuendoes;

- any verbal or physical conduct of a sexual or otherwise offensive nature that is made either explicitly or implicitly a term or condition of employment, or if the submission to, or rejection of, such conduct by an individual is used as a basis for employment decisions affecting such individual;
- negative stereotyping and unwelcome comments about an individual's body, physical characteristics or appearance;
- questions or comments about a person's sexual practices;
- sexist remarks or derogatory comments; and
- hostile actions against an individual because of that individual's gender or sex.

## **Relevance**

Johnson & Johnson has a considerable impact on the lives of many individuals whom we directly employ, and this includes providing a workplace in which employees can feel valued, safe and free from any form of harassment and bullying. We believe that fostering respect, tolerance and decency toward each other is not only the right thing to do, but it also gives us the best chance of being able to work together to advance our mission of profoundly changing the trajectory of health for humanity.

## **Guiding Principles**

As stated in [Our Credo](#): "We are responsible to our employees who work with us throughout the world. We must provide an inclusive work environment where each person must be considered as an individual. We must respect their diversity and dignity and recognize their merit."

We are also guided by the United Nations (UN) Guiding Principles on Business and Human Rights and/or Universal Declaration of Human Rights.

## **Our Position**

All of us have a right to work in an environment free from the demoralizing effects of harassment, and of offensive and improper conduct. At Johnson & Johnson, 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. Our Position includes:

**Prohibition of any act of bullying:** We prohibit any act of bullying that targets an individual or group of people and threatens, humiliates or intimidates them, or interferes with their work. Prohibited conduct includes: verbal conduct (such as jokes, threats, slurs, epithets, stereotyping, unwelcome comments about a person's protected characteristics, or offensive or derogatory voicemails); physical conduct (such as physically interfering with work, or impeding or blocking movements based on a person's protected characteristics); and visual conduct (such as offensive, derogatory or obscene videos, emails, texts, photographs, calendars, posters, cards, cartoons, drawings, gestures, unwelcome notes or letters, or any other written or graphic material).

**Prohibition of harassment:** We prohibit harassment based on any protected personal characteristics, including sexual harassment. As with bullying, prohibited conduct includes verbal, physical and visual conduct, and any acts as described above.

**Preventing harassment from non-employees:** We actively seek to protect employees from harassment or bullying by non-employees in the workplace and encourage employees to speak out if they experience such behavior. Similarly, we do not tolerate harassment or bullying by our employees of non-employees with whom Company employees have a business, service or professional relationship.

**Providing training and education:** Across the globe, we provide various training courses that address our policies prohibiting harassment and bullying in the workplace, including within our Code of Business Conduct training. All Johnson & Johnson employees are required to complete Code of Business Conduct training every two years after initial onboarding training. This training specifically includes educating individuals on different types of harassment and ways to support a harassment- and bullying-free workplace. People managers are provided manager-specific guidance on handling reports or instances of harassment and bullying. Many contractors, including those who are regularly on-site, are also required to participate in our Code of Business Conduct training.

**Providing a safe mechanism for reporting harassment:** We strongly encourage all employees and individuals who provide services in our workplace to report instances of harassment or bullying, whether personally experienced or observed in the workplace, at any level. We maintain clear procedures for reporting, investigating and resolving issues of harassment or bullying at each operating company.

Individuals should promptly report violations of our policies against harassment and bullying to their immediate supervisor, a higher level of management or a Human Resources Leader. The [Our Credo Integrity Line](#) 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.

**Investigating reports of harassment:** Allegations of harassment and bullying are taken very seriously by our Company and are appropriately investigated, generally by our Global Employee Relations group. Reported incidents are investigated with an effort to keep the source of the report confidential, with the disclosure of information only as appropriate to facilitate the investigation or resolution of the matter. Where inappropriate conduct has occurred, specific disciplinary actions—up to and including discharge where appropriate—are implemented.

**Prohibition of retaliation:** We do not tolerate retaliation by any employee against any person who in good faith reports possible harassment or bullying. Any individual who in good faith reports possible harassment or bullying will be protected from any form of retaliation.

**Upholding freedom of association and collective bargaining:** Respecting the right of employees to form and join a trade union of their choice without fear of intimidation or reprisal, in accordance with national law, is also a part of maintaining a harassment-free workplace. See also our [Position on Freedom of Association](#).

## Application

This Position is relevant for the Johnson & Johnson Family of Companies, as detailed in our [governance materials](#). See also our [Position on Human Rights](#) and our [Position on Providing a Discrimination-Free Workplace](#).

*Last updated: April 2025*