

Position on Responsible Interaction with Healthcare Professionals

Background

Ethical relationships with healthcare professionals (HCPs) are a critical part of developing and marketing healthcare products. Physicians need to learn how to prescribe new medicines and use new medical devices. Healthcare company representatives have an important role in teaching them about these products. At the same time, people expect the care they receive to be based on their individual needs and on the medical knowledge and experience of their doctors. They expect this care to be independent from commercial interests and focused solely on medically relevant and appropriate solutions in the best professional judgment of HCPs.

Relevance

As the world's largest and most broadly based healthcare company, operating to defined values, Johnson & Johnson aims to be a leader in ethical conduct in all that it does to protect its business and reputation, and its patients, consumers and employees. We must maintain professional relationships with all those who are connected to our business, and refrain from using our size and scale to improperly influence healthcare processes and the decisions of HCPs.

HCPs with real-world clinical experience in therapeutic areas relevant to Johnson & Johnson are uniquely qualified to provide education for new advancements related to our products and solutions. Our approach to working with these HCPs in both peer-to-peer education and product development is focused on improving the health of patients and driving optimal clinical outcomes through transparency and compliance. As science sometimes advances quickly, peer-to-peer education allows providers to objectively discuss important medical information with colleagues related to the appropriate use of our products.

Guiding Principles

At Johnson & Johnson, we are committed to maintaining the highest level of integrity and ethical and compliant conduct. As stated in [Our Credo](#): "We must provide highly capable leaders and their actions must be just and ethical... We are responsible to the communities in which we live and work and to the world community as well... We must be good citizens..." Also, our firm commitment to ethical and compliant conduct is embedded in Johnson & Johnson's [Code of Business Conduct](#).

Our Position

We recognize that the people who use and rely on our products place their trust in us and we never take this trust for granted. We are committed to protecting the medical judgment and treatment choices of HCPs from improper influences so that the patient's needs come first. To help ensure the integrity of the relationship between our Company, our medical representatives, and the many physicians and other HCPs with whom we interact, our standards, requirements and guidelines—including our detailed Health Care Compliance Global Framework, U.S. Regulatory Guidance and Health Care Business Integrity Guide—are consistent with Our Credo, and are based on laws, regulations and industry codes that apply to our business conduct with stakeholders, as well as the legal, regulatory and professional requirements of the countries where we do business. We hold Johnson & Johnson employees and all third parties who conduct business on behalf of Johnson & Johnson accountable for following the law and our requirements, standards and guidance related to properly interacting with HCPs and all HCP practice-related activities. See our [Position on Ethical Sales and Marketing](#).

Key industry laws, regulations and codes that we uphold:

- U.S. Federal Anti-Kickback statute that prohibits improper influence in healthcare decision-making by making it a crime to knowingly and willfully offer, give or receive anything of value in order to influence or obtain government healthcare business.
- U.S. Federal False Claims Act that prohibits making or inducing someone else to make a false claim for reimbursement from the federal government.
- U.S. Federal Food, Drug and Cosmetic Act prohibits manufacturers from making false or misleading statements about their products.
- U.S. Foreign Corrupt Practices Act (FCPA), which makes it unlawful for a U.S. person or a U.S. company to give or offer anything of value (directly or indirectly) to a non-U.S. government official to influence any act or decision by that official for the purpose of obtaining or retaining business.
- Compliance and disclosure laws and industry codes restricting or requiring public reporting about payments and other transfers of value made to HCPs. These include the Physician Payments Sunshine Act (commonly known as the "Sunshine Act" or "Open Payments"), part of the Patient Protection and Affordable Care Act and the Code on Disclosure of Transfers of Value from Pharmaceutical Companies to Healthcare Professionals and Healthcare Organizations, adopted by the European Federation of Pharmaceutical Industries and Associations (commonly known as the "[EFPIA Disclosure Code](#)").
- Country laws governing the advertising and promotion of medicinal products and medical devices; country laws governing the public tender process; country laws governing fair competition/antitrust issues.
- Industry codes that aim to protect medical decision-making from improper financial incentives and govern companies' policies on gift-giving, grants and other funding.

Standards on funding for professional education and to HCPs:

We collaborate with leading physicians on the development of new surgical devices, medicines and other patient and consumer solutions. These activities lead to important medical advances that help to improve the lives of those we serve. For all this partnership work, we uphold standards and other legal and voluntary requirements, in addition to those mentioned above, including:

- U.S. and other laws and regulations and industry standards governing registration and reporting of clinical trial results.

- Standards published by the [Pharmaceutical Research and Manufacturers of America \(PhRMA\)](#), which represents research-based pharmaceutical and biotechnology companies, and the [Advanced Medical Technology Association \(AdvaMed\)](#), which represents medical device manufacturers. These associations and similar industry organizations outside the United States, have established codes of ethics intended to protect medical decision-making from improper financial incentives.

Funding to HCPs: We aim to prevent real or perceived conflicts of interest that may arise from relationships between Johnson & Johnson and HCPs. We regularly review and update our practices that guide interactions with HCPs, institutions and other stakeholders in the healthcare system.

Disclosure of payments: In the United States, we disclose financial information under the Physician Payments Sunshine Act. We also voluntarily publish [aggregated data](#) for our companies covered by Open Payments. In Europe, we comply with the [EFPIA Disclosure Code](#) with disclosures on the [Janssen website](#). Other countries or regions have similar legal or industry code disclosure requirements that we have helped establish—and that we comply with—for fostering transparent business practices.

Funding for professional education: We recognize our responsibility to support HCPs in staying educated and up to date on medical information and trends so they may provide the best patient care possible. Our pharmaceutical and medical devices companies disclose the nature and volume of grants they make for professional education on their websites.

Reporting suspected ethical or compliance violations in relation to HCPs interactions and/or funding: Our Credo Integrity Line is an integral component of the strong compliance culture at Johnson & Johnson. It provides a channel for all employees, contractors, customers, third-party agencies and other partners to report potential violations of our [Code of Business Conduct](#) or any of the standards and codes governing interactions and funding for HCPs. The Credo Hotline is available 24 hours a day, 7 days a week and in 23 languages. The concerns can be filed electronically on [OurCredoIntegrityLine.com](#) or by calling a toll-free number from any international location.

Application

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

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