

# Norway Transparency Act Statement

For the fiscal year ended December 31, 2024

This Statement, together with the below Human Rights and Anti-Modern Slavery Statement (together the “Statement”), has been prepared pursuant to the Norwegian Transparency Act (2022) for the most recent prior financial year (being 2024).

This statement is provided by Janssen-Cilag AS.

The above-mentioned entity - which is a subsidiary of Johnson & Johnson—is a “Reporting Entity” and is referred to in this statement as “Johnson & Johnson Norway.”

This Statement provides the steps undertaken to continually improve policies and due diligence. These efforts are aimed at identifying, assessing and addressing human rights impacts—including fair working conditions, anti-modern slavery and child labour<sup>1</sup>. These steps and related policies and due diligence apply to Johnson & Johnson Norway, as part of Johnson & Johnson.

Unless expressly stated otherwise, all references to Johnson & Johnson, ‘we,’ ‘us’ and ‘our’ in this Statement refer to parent company Johnson & Johnson, including the Reporting Entity.

## About Johnson & Johnson Norway

### Our structure

Johnson & Johnson Norway is a fully owned subsidiary of Janssen-Cilag AB, which in turn is owned by Johnson & Johnson Nordic AB, which in turn is part of the international group of which Johnson & Johnson, USA, is the parent company. Johnson & Johnson Norway has more than 45 employees and runs its operations from Oslo.

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<sup>1</sup> Modern slavery is a broad term commonly used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. It can include but is not limited to forced labor and the worst forms of child labour in which children are subjected to slavery or similar practices and/or engaged in hazardous work.

Johnson & Johnson Norway is member of the Association of the Pharmaceutical Industry in Norway and the Norwegian Confederation of Business to share insights and good practices across industry.

### **Our operations**

Johnson & Johnson Norway's main activity is the sale and marketing of pharmaceutical products, medical equipment and contact lenses on the Norwegian market.

### **Our supply chain**

Johnson & Johnson Norway does not manufacture any products in Norway. Instead, the Reporting Entity provides sales and marketing support for products manufactured by Johnson & Johnson and its partners throughout the world and then imported into Norway.

Johnson & Johnson's global supply chain and supplier network support the acquisition of goods and services across Johnson & Johnson Norway operations, including finished products and indirect goods and services to support its business operations.

Johnson & Johnson Norway has created a Working Group with accountabilities for our approach to the Norwegian Transparency Act. The Working Group in Johnson & Johnson Norway engages with internal colleagues from a range of functions, including the Office of Sustainability, Procurement, Government Affairs and Policy, Legal and a member of the Johnson & Johnson Norway statutory board, on its approach to the Norwegian Transparency Act. The following are some of the main activities from 2024 particularly relevant to the Norwegian Transparency act:

- The Johnson & Johnson Norway Working Group maintained its operations to support and respond to incoming inquiries related to the Transparency Act. In 2024, all Norway employees and certain Nordic functions have been trained in the process to enhance awareness and comply with the Transparency Act. See the inquiry portal on the Johnson & Johnson Norway homepage here: <https://innovativemedicine.jnj.com/norway/samfunnsansvar/apenhetsloven>. In addition to this inquiry portal, 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.
- Johnson & Johnson Norway was part of an internal assessment in 2024 to further embed awareness and implementation of key provisions in our Position on Employment and Labor Rights.

## Norway Transparency Act Statement

Johnson & Johnson Norway’s work environment council also engaged employees on opportunities for strengthening the work environment, including through regular ‘temperature checks’ and action planning and implementation on matters identified.

- Further to this, suppliers to Johnson & Johnson Companies – including Johnson & Johnson Norway - are expected to uphold the Standards covered in the Responsibility Standards for Suppliers and demonstrate they have policies and management systems in place to identify, prevent, mitigate and account for their potential or actual negative impacts on human rights in their own operations, supply base and business relationships—including fair working conditions, anti-modern slavery and child labour.

Through the Working Group and in collaboration with other functions and colleagues, Johnson & Johnson Norway will continue to review and refine our approach to the Norway Transparency Act. We recognize that human rights due diligence is a process of continuous improvement, and we review and refine our approach on an ongoing basis.

## Consultation and approval

The Reporting Entity has an executive team responsible for its business.

In preparing this statement the executive team of the Reporting Entity, along with relevant functional teams, were consulted to ensure the statement appropriately reflects the practices of the Reporting Entity.

The statement was approved by the Board of Directors of Janssen-Cilag AS.

This statement was adopted and approved on the date as indicated in the electronic signature by:

Anne Merete Sveaass  
Chair of the Board

Mario Klesse  
Board Member

*Anne Sveaass*  
Electronically signed by: Anne Sveaass  
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Date: Jun 25, 2025 08:08 GMT+2

*Mario Klesse*  
Electronically signed by: Mario Klesse  
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Date: Jun 25, 2025 07:39 GMT+2

Norway Transparency Act Statement

Charlotte Krogh  
Board Member

*Charlotte Krogh*  
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Reason: I acknowledge that my  
electronic signature is the legally binding  
equivalent for my handwritten signature  
Date: Jun 25, 2025 10:17 GMT+2

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Anne Håvi  
Board Member

*Anne Håvi*  
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Reason: I acknowledge that my  
electronic signature is the legally  
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handwritten signature  
Date: Jun 25, 2025 16:34 GMT+2

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Raphael Patricot  
Board Member

*Raphael Patricot*  
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Patricot  
Reason: I acknowledge that my  
electronic signature is the legally  
binding equivalent for my handwritten  
signature  
Date: Jun 25, 2025 08:12 GMT+2

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# Human Rights and Anti-Modern Slavery Statement

For the fiscal year ended December 29, 2024

## Introduction

This Human Rights and Anti-Modern Slavery Statement (the “Statement”) has been prepared pursuant to the California Transparency in Supply Chains Act (2010), the UK Modern Slavery Act (2015), the Australia Modern Slavery Act (2018) (Cth), the Norwegian Transparency Act (2022) and the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act (2023).

This Statement sets out steps that the Johnson & Johnson Family of Companies (“Johnson & Johnson” or the “Company” or “we” or “our”) has taken to continually improve policies and due diligence to identify, assess and address human rights impacts— including fair working conditions, anti-modern slavery and child labor—in our own business operations and our supply base.

The Statement constitutes the disclosure for Johnson & Johnson’s 2024 fiscal year ended December 29, 2024.

## About Johnson & Johnson

### Structure

Johnson & Johnson has approximately 138,000 employees worldwide engaged in the research and development, manufacture and sale of a broad range of products in the healthcare field. The Company conducts business in many countries around the world with the primary focus on products related to human health and well-being.

### Operations

The Company is organized into two business segments: Innovative Medicine and MedTech. The Innovative Medicine segment is focused on the following therapeutic areas: Oncology, Immunology, Neuroscience,

Cardiopulmonary and Communicable Diseases. The MedTech segment includes a broad portfolio of products used in the Cardiovascular, Orthopaedics, Surgery and Vision categories.

### Supply base

A critically important link in our supply chain, our global supplier network plays a vital role, enabling us to manufacture and deliver essential products and services to our patients and customers. Guided by [Our Credo](#) values, we aim to maintain collaborative supplier relationships and work with a broad range of suppliers. The Company has approximately 29,000 suppliers globally.

## Governance

Our Enterprise Human Rights Governance Council (EHRGC) leads our global approach to human rights due diligence and program management, including fair working conditions, anti-modern slavery and child labor. EHRGC members are senior commercial leaders and other leaders representing key functions across the enterprise, including the Office of Sustainability, Human Resources, Procurement, Office of the Chief Medical Officer, Government Affairs and Policy, Global Legal Organization, Corporate Affairs, and the Office of the Corporate Secretary.

Two members of the Johnson & Johnson Executive Committee—the Executive Vice President, Chief Human Resources Officer; and the Executive Vice President, Chief Technical Operations & Risk Officer—serve as executive sponsors of our human rights program. The Regulatory Compliance & Sustainability Committee of the Johnson & Johnson Board of Directors provides oversight of management’s approach to human rights.

## Policies & Positions

Our [Position on Human Rights](#), first developed in 2012, sets out our commitment to respecting internationally recognized human rights in our own operations and across our value chain, as provided in the International Bill of Human Rights and the International Labour Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work. Our approach is further guided by the United Nations Guiding Principles on Business and Human Rights, and the Organisation for Economic Co-operation and Development Guidelines for Multinational Enterprises on Responsible Business Conduct.

## Human Rights and Anti-Modern Slavery Statement

Our [Position on Human Rights](#) outlines our commitments on fair working condition topics such as anti-modern slavery; child labor; freedom of association and collective bargaining; working hours and compensation; and safe and healthy working environments. Further to this, our [Anti-Human Trafficking Policy](#) prohibits the use of any forced or bonded labor in the manufacture of any product, or any component of a product, by or for any of our businesses; and our [Employment of Young Persons Policy](#) prohibits the employment of young persons (under the age of 18) anywhere in our business, other than in compliance with ILO Conventions 138 and 182 and all applicable laws and regulations concerning age, hours, compensation, health and safety. Further information on our approach is also reflected in related [ESG Policies & Positions](#), including but not limited to our [Position on Employment and Labor Rights](#) and [Position on Employee Development and Total Health and Well-Being](#).

Our commitment to respecting human rights, fair working conditions, anti-modern slavery, and child labor extends into all facets of our operations, including our supply base. As such, we expect our suppliers to share our commitments that we have outlined herein and we expect our suppliers to uphold the standards covered in our [Responsibility Standards for Suppliers](#) (RSS).

## Due diligence

We have due diligence processes and management systems in place to identify and address potential and actual human rights impacts, including fair working conditions, anti-modern slavery and child labor. We recognize that human rights due diligence is a process of continuous improvement, and we review and refine our approach on an ongoing basis.

In 2024, we continued to strengthen due diligence on fair working conditions for our employees and workers in our supply base by more deeply integrating due diligence procedures, risk assessment and accountabilities into human resources and procurement management systems.

- **Our workforce**

We believe in upholding our employees' rights as individuals in the workplace and in helping them thrive and prosper, and are committed to supporting a workplace where everyone can thrive and return home safely at the end of the working day.

Our Environmental Health and Safety (EH&S) Management approach is how we ensure compliance with our [EH&S Policy](#), applicable regulatory requirements, and EH&S Standards. In 2024, we expanded

the integration of Human and Organizational Performance<sup>2</sup> (HOP) principles into key manufacturing sites across the Company, with sites conducting baseline assessments that led to actionable plans for implementing HOP principles and improving workplace safety.

In 2024, we also conducted a review across 19 countries in which J&J has operations, to further embed awareness and implementation of key provisions in our [Position on Employment and Labor Rights](#). Further to this, in line with our commitment to fair working conditions, we continued in 2024 to implement an annual living wage assessment to provide employees with pay that is both market competitive and sufficient to attain a sustainable standard of living.

### • **Our supply base**

Suppliers to Johnson & Johnson Companies are expected to uphold the Standards covered in the RSS and demonstrate they have policies and management systems in place to identify, prevent, mitigate and account for their potential or actual negative impacts on human rights in their own operations, supply base and business relationships—including fair working conditions, anti-modern slavery and child labor.

We encourage constructive engagement with our suppliers and aim to assist in building their capabilities in line with these Standards. Johnson & Johnson may disqualify any potential supplier or terminate any relationship with a current supplier that has failed to conform to these Standards.

In 2024, we continued to strengthen our processes and tools to identify, assess and address risks in our supply base as part of our compliance with laws and regulations and to check conformance to the Human and Labor Rights section of our RSS. Examples of key activities undertaken in 2024 are:

- **Risk screening:** Johnson & Johnson first-tier suppliers were monitored using a tech-enabled risk screening tool to evaluate risk across a range of potential human rights and environmental metrics—including fair working conditions, anti-modern slavery and child labor—using country and industry risk indicators.

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<sup>2</sup> HOP is a methodology to enhance our understanding of how individuals interact with their work environment, including processes and procedures to identify and address potential areas where human error could lead to safety risks.

- **EcoVadis assessments:** Broad-based assessments of our suppliers' environmental, human rights, ethics and sustainable procurement capabilities—including fair working conditions, anti-modern slavery and child labor—were administered through EcoVadis. These assessments were completed by suppliers identified as potential high risk, as well as strategic suppliers that represent high spend and high impact to Johnson & Johnson. Depending on the risk(s) identified in a supplier's EcoVadis assessment score, further action may have been required. For example, low scoring suppliers must complete a reassessment within a year, while higher scoring suppliers are required to repeat the assessment on a two- or three-year basis. In 2024, over 1,000 Johnson & Johnson suppliers completed EcoVadis assessments.
- **Environmental Health & Safety (EH&S) audits:** We conduct EH&S audits with select suppliers based on an overall risk assessment using EcoVadis scores, types of goods and services provided, and geographical location. Audits are conducted using the audit protocol developed by the Pharmaceutical Supply Chain Initiative (PSCI), with J&J completing more than 130 supplier EH&S audits and technical visits in 2024.
- **Human Rights audits:** We select suppliers for human rights audits if they have, for example, a low EcoVadis Labor and Human Rights score; they operate in a high-risk country or industry; and/or we identify risks relating to the supplier through other channels. Human Rights audits are conducted using the Sedex Members Ethical Trade Audit (SMETA) 4-pillar guidelines by an accredited external organization on behalf of Johnson & Johnson. A SMETA 4-pillar audit comprises labor standards, health and safety, management systems, human rights, recruitment, entitlement to work, subcontracting and homeworking, environmental assessment and business ethics.
- **Conflict minerals:** As a member of the Responsible Minerals Initiative and in line with regulatory requirements, we remain committed to taking steps to determine the use, country of origin and source of tin, tungsten, tantalum and gold (3TG) in our global product portfolio. We support government and industry efforts to prevent human rights abuses in 3TG sourcing. For more information, see our [Position on Conflict Minerals](#) and SEC Filings (Form SD) on our [Investor webpage](#) for our 2024 Conflict Minerals Report.

In 2024, we also developed a tool to identify procurement categories at potentially higher risk of modern slavery and developed an action plan for prioritized due diligence. The tool considers risk factors such as vulnerable worker populations, working practices and geographic location. In addition, we continued our engagement with the PSCI and other organizations to develop a freely available map of labor migration corridors at higher risk of recruitment fees. This innovative due diligence resource aims to provide companies across all sectors with data on supply chain worker recruitment fees to enable informed decisions relating to migrant worker human rights.

## Grievance mechanisms

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 do not tolerate threats or acts of retaliation in any circumstance. We communicate the Our Credo Integrity Line so that employees and other stakeholders such as workers in our supply base can access this channel to raise grievances at any time.

Additionally, employees can report potential violations by telephone, e-mail or in person within their local business segment or to the Company's global internal audit & assurance, healthcare compliance, legal, security or human resources organizations.

## Building knowledge and capabilities

- **Our workforce**

Every Johnson & Johnson employee has a role to play in delivering on our commitment to respect human rights, including fair working conditions, anti-modern slavery and child labor.

Our [Code of Business Conduct](#) applies to all our employees around the world as well as identified contingent workers. The Code of Business Conduct is available in 27 languages and is designed to inform employees and contingent workers of relevant laws, Company policies and ethical standards to help identify risks and ensure compliant practices in every market where we operate. All Company employees and contingent workers are required to complete training on the Code of Business Conduct on a biennial basis and all new employees must complete training upon joining the Company.

This is supplemented by our Human Rights training module, available to all employees globally. In addition, we provide training in responsible supply chain practices for Procurement employees, comprised of the Johnson & Johnson RSS and our Human Rights Learning and Education module.

- **Our supply base**

In 2024, as part of Johnson & Johnson's Onward Sustainability Training Program for suppliers, we held a dedicated 'Anti-Modern Slavery' training session for suppliers to build awareness of Johnson & Johnson's RSS and to share insights on due diligence approaches for identifying, assessing and addressing potential and actual modern slavery risks.

## External engagement

We engage with a range of internal and external stakeholders in our due diligence processes to identify, assess and address potential and actual human rights impacts—including fair working conditions, anti-modern slavery and child labor—and take consideration of rightsholders that are potentially more vulnerable to human rights impacts. We work with specialist human rights organizations to inform and support our approach to human rights and we participate in various external platforms to share insights and good practices across industry.

## Monitoring

We recognize the importance that tracking effectiveness plays in supporting continuous improvement of our approach to respecting human rights, including fair working conditions, anti-modern slavery and child labor. Examples of monitoring activities undertaken in 2024 are:

- Periodically updating our policies and positions to reflect our approach;
- Setting timebound annual action plans, aligned to priority focus areas and overseen by the EHRGC;
- Strengthening due diligence processes through post implementation analysis;
- Tracking metrics (e.g., suppliers completing EcoVadis Assessments; percentage of Our Credo Integrity Line inquiries and reports).

## Conclusion

We are committed to continuous improvement in our efforts to identify, assess, and address human rights impacts in our own operations and in our supply base. As we make further progress, we will report on that progress through subsequent versions of this statement and other disclosures.

# [2233984] COMBINED\_Norway Transparency Act Statement\_Jun2025

Final Audit Report

2025-06-25

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-  Email viewed by Mario Klesse (mklesse@its.jnj.com)  
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-  Mario Klesse (mklesse@its.jnj.com) has agreed to the terms of use and to do business electronically with JOHNSON AND JOHNSON SERVICES, INC.  
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-  Document e-signed by Mario Klesse (mklesse@its.jnj.com)  
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 Anne Sveaass (asveaass@its.jnj.com) has agreed to the terms of use and to do business electronically with JOHNSON AND JOHNSON SERVICES, INC.

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 Raphael Patricot (rpatrico@its.jnj.com) has agreed to the terms of use and to do business electronically with JOHNSON AND JOHNSON SERVICES, INC.

2025-06-25 - 6:12:17 AM GMT- IP address: 147.161.188.255

 Document e-signed by Raphael Patricot (rpatrico@its.jnj.com)

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2025-06-25 - 8:17:10 AM GMT- IP address: 147.161.147.30

 Charlotte Krogh (ckrogh@its.jnj.com) has agreed to the terms of use and to do business electronically with JOHNSON AND JOHNSON SERVICES, INC.

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