

Anti-Human Trafficking Policy

Johnson & Johnson Family of Companies (“Johnson & Johnson” or “the Company”) strictly prohibits employees, subcontractors, subcontractor employees, and agents from engaging in human trafficking-related activities. These activities include engaging in sex trafficking, procuring commercial sex acts (even if this practice is legal in the jurisdiction where it transpires), using force, fraud or coercion to subject a person to involuntary servitude, or obtaining labor from a person by threats of serious harm to that person or another person.

Johnson & Johnson also prohibits employees, subcontractors, subcontractor employees and agents from engaging in practices relating to trafficking in persons, including:

- Destroying or otherwise denying access to an employee’s identity or immigration documents;
- Using misleading or fraudulent practices to recruit employees, such as failing to disclose key terms and conditions of employment;
- Using recruiters who do not comply with local labor laws;
- Charging employees recruitment fees;
- Failing to provide return transportation to certain employees who are brought to a country for the purpose of working on a U.S. Government contract;
- Providing housing that fails to meet host country standards; and
- Failing to provide an employment contract or work document where required by law.

Johnson & Johnson will take appropriate disciplinary action for violations of these rules, up to and including discharge of employees, subcontractors, and agents.

Johnson & Johnson cooperates fully with the U.S. Government or other appropriate governmental authorities in audits or investigations relating to such violations. Employees of Johnson & Johnson are required to cooperate in any internal or external investigation of suspected wrongdoing under this Policy.

Mandatory reporting requirements

When information is brought forward concerning a Johnson & Johnson Company, employee, contractor, subcontractor, subcontractor employee or agent concerning a potential violation of this Anti-Human Trafficking Policy, it is the responsibility of each Company employee or contractor and/or external service provider to immediately report details of the violation directly to the Johnson & Johnson Chief Audit Executive, either verbally or in writing, including by e-mail via chiefauditexecutive@its.jnj.com, in accordance with the Johnson & Johnson Escalation Procedure. Failure to report actual or potential illegal behavior or actual or potential violations of this Policy may subject employees to disciplinary action, up to and including termination of employment.

The mandatory reporting requirement described above must be escalated regardless of whether potential violations of this Policy were identified through the receipt of signed or anonymous letters or calls, reporting by employees directly to their line management or other Corporate staff or via the [Our Credo Integrity Line](#) (a grievance mechanism available to all employees, suppliers and other business partners that provides a secure mechanism for anonymous reporting, where permitted, of potential concerns or violations of Johnson & Johnson policies or applicable law, including potential human rights violations). Any person who receives reports of possible violations under this Policy must notify the Johnson & Johnson Chief Audit Executive immediately as described above.

Non-retaliation policy

Johnson & Johnson companies do not tolerate retaliation or threats of retaliation against anyone who raises a concern under this Policy or who assists with an internal or external audit or investigation. Any employee who engages in retaliation or threats of retaliation will face disciplinary action, including potential termination of employment.

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