

Norway Transparency Act Statement 2022

This statement addresses the Norway Transparency Act (Transparency Act) and sets out the steps that Janssen-Cilag AS, a Norwegian company (“Janssen Norway”) within the Johnson & Johnson Family of Companies (“Johnson & Johnson” or “the Company”) has taken to strengthen our due diligence processes to identify and address modern slavery and human trafficking in our business operations and supply chain¹.

About Johnson & Johnson

Johnson & Johnson, through its Family of Companies (“the Company”), is the largest, most diversified healthcare products company, headquartered in New Jersey, U.S. Our operating companies employ approximately 153,700 employees² in virtually all countries of the world, who are engaged in the research and development, manufacture and sale of a broad range of products in the healthcare field. We work with more than 46,000 suppliers and hundreds of external manufacturers to support the development and manufacturing of our products worldwide. The Company’s product portfolio includes thousands of Pharmaceutical, MedTech and Consumer Health products that address the health and wellness needs of people every day.

At Johnson & Johnson, we believe good health is the foundation of vibrant lives, thriving communities and forward progress. That’s why for more than 135 years, we have aimed to keep people well at every age and every stage of life. Today, as the world’s largest and most diversified healthcare products company, we are committed to using our reach and size for good. We strive to improve access and affordability, create healthier communities, and put a healthy mind, body and environment within reach of everyone, everywhere. Janssen-Cilag AS, a company in the family of Johnson & Johnson, sells prescription and non-prescription pharmaceutical products as well as technical medical equipment, disposable medical equipment, contact lenses and hygiene products on the Norwegian market. Janssen Norway runs its operations from Oslo and is guided by the Johnson & Johnson principles and Credo which is embedded in our daily work and our Standard Operating Procedures. In October 2022, the Consumer Health division (Kenvue) of Janssen Norway was separated into a newly created company, JNTL Consumer Health (Norway) AS. Kenvue was part of Johnson & Johnson for all of 2022 (the reporting period for this 2023 Norway Transparency Act Statement)¹

Governance

Our global Enterprise Human Rights Governance Council (EHRGC) leads our worldwide approach to human rights due diligence and management. EHRGC members are senior leaders representing key functions across our business, including Human Resources, Procurement, Office of the Chief Medical Officer, Commercial Representation, Government Affairs and Policy, Legal, Corporate Affairs and the

¹ In November 2021, Johnson & Johnson “the Company” announced its intention to separate the Company’s Consumer Health business into a new, publicly traded company. In September 2022, Kenvue was announced as the name for the planned New Consumer Health Company. Kenvue was part of Johnson & Johnson for all of 2022 (the reporting period for this 2023 Norway Transparency Act Statement). Kenvue completed an initial public offering of 198,734,444 shares of its common stock on May 8, 2023. As of the closing of the initial public offering, the Company owned approximately 89.6% of the total outstanding shares of Kenvue common stock. The Company remains on track to complete the separation in 2023, subject to market conditions. In future reporting years, starting with the 2024 Norway Transparency Act disclosure, Kenvue data will not be included, nor restated.

² Biomed headcount is not included in this total employee number due to year-end acquisition timing and our Human Resources Information System integration processes.

Enterprise ESG Program Office. The EHRGC coordinates with other governance bodies that have relevance to our approach to human rights.

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 and provide executive support and oversight. The Regulatory Compliance & Sustainability Committee of the Johnson & Johnson Board of Directors provides oversight of management’s approach to human rights.

In 2022, Janssen Norway created a Working Group responsible for our approach to the Norwegian Transparency Act, with members from the local Statutory Board, local and global Sustainability teams, local and global Legal and local and global Government Affairs teams and with input from Enterprise Functions including the Enterprise ESG Program Office, Procurement, Environmental Health and Safety and Human Rights.

Policies and Positions

Johnson & Johnson has a longstanding commitment to respecting human rights that is embedded in Our Credo and reflected throughout our organization in the way we conduct business. Our approach to human rights, including modern slavery and human trafficking, is outlined in both our Position on Human Rights and our Responsibility Standards for Suppliers (RSS); it is also reflected in our related ESG Policies and Positions and annual regulatory disclosures.

The work completed and in progress at the Enterprise level on human rights risks and related due diligence, is applicable to Janssen Norway as part of the multinational Johnson & Johnson, and the measures described in this report apply to Janssen Norway.

We prohibit 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. We do not tolerate any form of trafficking or unlawful exploitation of individuals. We also prohibit the employment of young persons (under the age of 18) anywhere in our business, other than in compliance with International Labour Organization Conventions (ILO Conventions) 138 and 182 and all applicable laws and regulations concerning age, hours, compensation, health and safety. See also our Employment of Young Persons Policy and Anti-Human Trafficking Policy.

- [Code of Business Conduct](#)
- [Position on Human Rights](#)
- [Anti-Human Trafficking Policy](#)
- [Employment of Young Persons Policy](#)
- [Position on Employment and Labor Rights](#)
- [Position on Employee Compensation and Benefits](#)
- [Position on Freedom of Association](#)
- [Position on Providing a Discrimination-Free Workplace](#)
- [Position on Providing a Safe and Harassment-Free Workplace](#)
- [Position on Environmental Health and Safety Management](#)
- [Environmental Health and Safety Policy](#)
- [Position on Responsible Supply Base](#)
- [Responsibility Standards for Suppliers](#)
- [Position on Conflict Minerals](#)

- [Responsible Palm Oil Sourcing Policy](#)
- [Responsible Wood-Fiber Product Sourcing Policy](#)
- [Position on Resolving Employee Grievances](#)

See the ESG Policies and Positions on our website for more information [here](#).

Our commitment to respecting and promoting human rights, including modern slavery and human trafficking, 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 monitoring management systems in place in furtherance of this commitment.

In line with the United Nations Guiding Principles (UNGPs), we focus our efforts where there may be potential or actual risk of adverse human rights impacts linked to Johnson & Johnson activities and business relationships. We conduct enterprise-level human rights risk assessments and prioritization, internal and external stakeholder engagement, and ongoing due diligence to identify human rights priority focus areas.

We expect our business partners—including suppliers and customers—to share our commitment to respect human rights. All suppliers shall comply with our RSS, 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, environment and business ethics provisions of the RSS.

The business operates in a highly regulated market, including CE-marking³ for medical technology and marketing authorization issued by the Norwegian Medicines Agency for pharmaceuticals.

In July 2022, Janssen Norway established an internal process to handle and support incoming inquiries related to the Transparency act. The process was communicated to all Norway employees and certain Nordic functions. See the inquiry portal on the Janssen Norway homepage here - <https://www.janssen.com/norway/om-oss/apenhetsloven>.

Improving human rights due diligence

All companies within the Johnson & Johnson Family of companies continually evolve and strengthen our broad-based human rights due diligence process. In 2022, we worked with ERM, an independent sustainability consultancy, to develop a risk identification tool to better identify geographies and sites at a potentially higher risk of adverse human rights impacts within Johnson & Johnson's own operations and facilities. The tool will be deployed in 2023 to prioritize targeted due diligence reviews.

In 2022, we established an Anti-Modern Slavery work stream to advance our due diligence efforts in this area. We worked with Impactt—a consulting firm specializing in ethical trade and human rights—to support us in developing a suite of modern slavery due diligence materials such as training materials, a supplier assessment questionnaire and investigation guidelines. We also integrated Verisk Maplecroft risk indicators on modern slavery into our Supplier Risk Management system to identify potentially higher-risk suppliers. This work will inform further due diligence in 2023.

³CE marking indicates that a product has been assessed by the manufacturer and deemed to meet EU safety, health and environmental protection requirements. It is required for products manufactured anywhere in the world that are then marketed in the EU. (Source: https://europa.eu/youreurope/business/product-requirements/labels-markings/ce-marking/index_en.htm#abbr-ID0E1)

Responsible sourcing

Throughout our business, we source commodities and raw materials, some of which require heightened procurement focus due to critical environmental or biodiversity concerns or elevated human rights risks in the supply chain. We work to understand the potential risks and impacts of our procurement activities in these areas and define appropriate standards and controls in responsible sourcing of commodities and raw materials of concern.

In particular, we maintain multiple multiyear forest partnerships to enable the protection of tropical rainforests that are critical for climate mitigation, wildlife conservation and long-term community well-being. We focus on palm oil, working with the Earthworm Foundation and BSR's Action for Sustainable Derivatives initiative, and wood-fiber products, working with the Rainforest Alliance, to build transparency in our sourcing and supply and engage our suppliers in responsible practices.

Conflict minerals: As members 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 in our global product portfolio.

Janssen Norway sells prescription and non-prescription pharmaceutical products as well as technical medical equipment, disposable medical equipment, contact lenses and hygiene products. The Working Group which is responsible for our approach to the Norwegian Transparency Act, has assessed that the main area of risk with regards to human rights and labor rights are mainly related to the supply base that takes place outside Norwegian borders and as such managed by the Global organization as outlined above. Services procured in Norway are all subject to Norwegian law and undergo processes for internal quality approval. It is an ongoing process to identify potential gaps and update internal processes according to the Transparency Act.

Supplier Engagement

In our supply base, we continued to assess human rights risks in our supply chain through the use of tools such as EcoVadis self-assessments from suppliers in our Supplier Sustainability Program (SSP) and supplier audits. We also updated our RSS, which strengthened guidance on how suppliers should establish policies and management systems to identify and address human rights impacts, and we provided training for suppliers on the RSS updates.

We continued to strengthen our processes and tools to assess, verify 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. Our human rights in the supply base work included targeted due diligence of existing and potential suppliers, including the use of on-site SMETA (Pillar 4) audits and fuller investigations of potential high-risk commodities and supply chains. We also deployed two tech-enabled risk assessment tools: (i) using AI to gain upstream supply chain visibility of potential high-risk commodities, and (ii) embedding third-party modern slavery metrics in our SSP to assess potential supplier risks.

Addressing non-conformance

We categorize supplier non-conformances for both EH&S and social audits as critical, major and minor, and we communicate the findings and how we categorize them to each supplier with our expectations for a documented plan of time-bound corrective actions and demonstrated improvement. When critical findings are identified during audit, we expect immediate mitigation of the risk. We aim to maintain long-term relationships with suppliers and prefer to work with them to resolve audit findings and drive continual improvements in standards. If significant non-conformance

with our standards cannot be sufficiently resolved, we withdraw business from that supplier or decline to start business with a potential new supplier.

Post-audit support

We provide the following forms of support for post-audit supplier improvement:

- Follow-up technical visits that include expert training and best practice sharing
- Business reviews with direct coaching and guidance
- Supplier conferences, webinars and other resources

The Working Group continues to take steps to identify and address potential human rights impacts in our Norwegian operations. Janssen Norway has established a public Inquiry Portal and the Working Group will review our compliance to the Requirements of the Transparency Act on a regular basis.

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.

Building human rights knowledge and capabilities

All Johnson & Johnson employees and certain categories of contingent workers, including those of Janssen Norway are assigned and required to complete the Code of Business Conduct training, available in 27 languages, every two years. This training includes guidance related to human rights. Furthermore, our Foundational Human Rights Learning and Education course is available to all employees globally. At the end of 2022, more than 3,400 employees and contingent workers key to our human rights program had completed the module.

In 2022, we held the first dedicated human rights training session as part of our Onward Sustainability Training Program—launched in 2021 and part of our SSP—for suppliers, providing guidance on developing human rights policy commitments.

We continue to participate in various external platforms to share insights and good practices across industry, including Shift's Business Learning Program, BSR's Human Rights Working Group and the Pharmaceutical Supply Chain Initiative Human Rights and Labor Working Group.

Conclusion

We are committed to continuous improvement in our efforts to identify, prevent and remedy human rights abuses in our supply chain. As we make further progress in the above areas, we will report on that progress through subsequent versions of this statement.

Last Updated: June 2023

Signatures, Board of Directors

Oslo, 27 June 2023

Barbara Suter

Electronically signed by: Barbara Suter
Reason: I acknowledge that my electronic signature is the legally binding equivalent for my handwritten signature
Date: Jun 27, 2023 13:08 GMT+2

Barbara Suter

Chairperson of the board

NATALIYA SYCHEVA

Electronically signed by: NATALIYA SYCHEVA
Reason: I acknowledge that my electronic signature is the legally binding equivalent for my handwritten signature
Date: Jun 27, 2023 13:19 GMT+2

Nataliya Sycheva

Board member

Anne Håvi

Electronically signed by: Anne Håvi
Reason: I acknowledge that my electronic signature is the legally binding equivalent for my handwritten signature
Date: Jun 29, 2023 09:30 GMT+2

Anne Håvi

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 27, 2023 13:42 GMT+2

Charlotte Krogh

Board member










[1935677] Norway Transparency Act statement 2022 - J-C AS


Final Audit Report

2023-06-29

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 Agreement completed.

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