

Position on Responsible Chemical Management

Background

Responsible chemical management is a systematic approach toward selecting, evaluating, procuring, storing, transporting, using and disposing of chemicals in research and development (R&D), manufacturing and operations (collectively, “operations”).

Relevance

Johnson & Johnson uses chemicals in its R&D and in its manufacturing of healthcare products. Chemicals enable us to develop pharmaceutical products and medical technologies that are used to help improve the lives of people around the world. We recognize the importance of responsible chemical management, which includes taking necessary measures to comply with applicable global laws, regulations and standards that aim to protect worker health and safety and to minimize environmental risks.

Guiding Principles

As stated in [Our Credo](#): “We are responsible to the communities in which we live and work and to the world community as well ... We must maintain in good order the property we are privileged to use, protecting the environment and natural resources.”

As the largest, most diversified healthcare products company, Johnson & Johnson recognizes that human health is inextricably linked to the health of the planet—healthy people and communities need a healthy environment.

Our Position

Our approach to responsible chemical management in our operations focuses on occupational health and safety, and aims to minimize potential risk of chemicals to the environment and the communities in which we operate, as summarized below:

- **Risk Identification**

We continuously monitor and evaluate scientific research; applicable global laws, regulations and standards; environmental sustainability developments; and stakeholder¹ requirements concerning the use of chemicals in operations.

We use scientific evidence as the basis to assess environmental and worker health and safety risks

¹ Stakeholders include our consumers, customers, regulators, investors, non-governmental organizations and scientific community/academia.

associated with chemicals in our operations.

We conduct risk and impact assessments of chemicals in our operations as part of our risk management and decision-making processes.

If we identify chemicals of particular concern² in our operations, we seek alternatives that are legally and practically feasible.

- **Chemical Management in Our Operations**

We have internal chemical management programs to routinely track and maintain up-to-date chemical inventories at our operations locations. Our Environmental Health and Safety (EH&S) Standard on Chemical Management governs the safe management and use of chemicals at our global manufacturing and R&D locations. From a worker perspective, we control exposures to acceptable levels based on regulatory exposure limits, industrial hygiene monitoring and scientific developments.

New chemicals that are brought onto any Johnson & Johnson location are assessed from an environmental, occupational safety, human health and process safety perspective.

- **Chemical Management in Our Products**

We determine the hazard characteristics and the risk profile of chemicals, and for chemicals of particular concern we evaluate alternative chemicals prior to their use in our products, including packaging.

We have programs in place to comply with all applicable global regulations governing registration and labeling of chemicals. In the European Union (EU) this includes regulations of the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH); the Restriction of Hazardous Substances (RoHS) Directive; and the Globally Harmonized System of Classification and Labelling of Chemicals (GHS). We comply with those of the U.S., including regulations set by the Toxics Release Inventory (TRI) Program), and with those of China and elsewhere.

We submit information about EU REACH Substances of Very High Concern (SVHCs) in our finished products into the European Chemicals Agency (ECHA) Substances of Concern in Products (SCIP) database in accordance with the EU Waste Framework Directive Article 9.

We author and disclose Safety Data Sheets (SDS) for applicable Johnson & Johnson products, and we partner with our suppliers to obtain SDS for chemicals that we procure from them.

- **Supplier Engagement**

Johnson & Johnson has developed [Responsibility Standards for Suppliers](#) (RSS) that reflect our internal values and expectations of external stakeholders.

As reflected in our RSS, we expect our suppliers to ensure that the products we procure from them comply with any applicable requirements regarding restricted or banned chemicals. We continually monitor our suppliers' compliance with our RSS through formal EH&S assessment and audit

² Chemicals of Particular Concern are chemicals listed on various global environmental regulatory compliance lists as well as customer and other stakeholder lists.

programs, including review and verification of responsible management of chemicals.

As part of our risk management, we query our suppliers and extended supply chain, and strive to obtain chemical composition information on both formulated and finished products that we source, including packaging. We also partner with our suppliers to drive increased transparency down the value chain and share best management practices when it comes to chemical management.

- **Stakeholder and Industry Engagement**

Partnerships are integral to our approach to chemical management. We work closely with regulatory authorities, trade associations and non-governmental organizations to monitor and to evaluate developments on responsible chemical management.

Application

This Position is relevant for the Johnson & Johnson Family of Companies as detailed in our [governance materials](#). We provide updates relating to responsible chemical management in our annual [Health for Humanity Report](#).

See related Policies and Positions available on our website:

[Position on Conflict Minerals](#)

[Position on Impact of Pharmaceuticals and Personal Care Products in the Environment](#)

[Position on Patient Safety](#)

[Position on Sustainable Products and Packaging](#)

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