

# Position on Transparency

## Background

All companies, especially public companies, should be accountable to their stakeholders for their business activities. Transparency in financial and other dealings demonstrates accountability, fosters trust, and enables stockholders and stakeholders to make informed decisions about their interactions with a company.

## Relevance

At Johnson & Johnson, the largest, most diversified healthcare products company, we believe in conducting our business with integrity and earning the trust of the people we serve. For us, this includes complying with applicable legal, regulatory and industry code requirements, and upholding the highest ethical standards in every aspect of our business and in every market where we operate. Doing so means being transparent about the way we do business, about the way we comply with laws and regulations, and about payments, pricing and all forms of financial contributions in the countries in which we operate and to the communities we serve.

## 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 be good citizens — support good works and charities, better health and education, and bear our fair share of taxes.”

Our commitment to transparency is also embedded in Johnson & Johnson’s [Code of Business Conduct](#).

## Our Position

At Johnson & Johnson, we value transparency as the basis of trust building with all those engaged in any way with our business. We strive to hold ourselves accountable by providing information about how we function across our operating companies and markets.

We recognize and comply with the multiple reporting requirements that regulatory bodies governing our business segments define; in addition, we publish a wide range of voluntary as well as mandatory disclosures. Our key disclosures are summarized below:

**Financial Disclosures:** We report on our financial results and other material disclosures as required for a U.S. public company by the Securities Exchange Commission and the New York Stock Exchange. Our filings are available on [our corporate site](#).

**Environmental, Social and Governance (ESG) Disclosures:** We publish our annual [Health for Humanity Report](#) in line with leading global standards (Global Reporting Initiative and Sustainability Accounting Standards Board) and frameworks ([United Nations Global Compact](#), Norges Bank Investment Management

and Basel Institute on Governance's "Measuring effectiveness of anti-corruption programmes"), covering a broad range of non-financial updates and performance.

**Environmental Disclosures:** In addition to our Health for Humanity Report, we disclose to [CDP](#), Task Force on Climate-Related Financial Disclosures (TCFD), and other environmental and ESG rating frameworks.

**Payments to Healthcare Professionals and Healthcare Organizations:** We uphold compliance and disclosure laws and industry codes restricting or requiring public reporting about payments and other transfers of value made to healthcare professionals (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 Organisations, adopted by the European Federation of Pharmaceutical Industries and Associations (commonly known as the "EFPIA Disclosure Code"). For more information, see our [Position on Responsible Interaction with Healthcare Professionals](#). For more information on our responsible engagement with patient organizations see our Janssen [Statement on Interactions with Patient Organizations](#).

**Clinical Data Transparency:** We support the overall principles of greater clinical trial data transparency, including registration and disclosure of clinical trial results in external registries; publication of results in peer-reviewed journals; and sharing of clinical study reports and participant-level data from clinical trials. Clinical trials conducted around the world by our Pharmaceutical, MedTech and Consumer Health companies are listed on the U.S. National Institutes of Health's website, [www.clinicaltrials.gov](http://www.clinicaltrials.gov); the EU Clinical Trials Register; and country-specific and regional registries across the globe.

**Political Engagement:** As a global healthcare company, Johnson & Johnson works with many stakeholders in the markets where we operate, and we take a stance on and support certain public policies in the United States and in different parts of the world as they relate to our core business of advancing health. Our stakeholders express interest in knowing what our policy positions are and the ways we contribute to advancing those policies. We disclose this information annually, including our philosophy on political contributions, our strategic priorities and our contributions data. Please visit [Political Engagement](#) for more information.

**Pricing Transparency in the United States:** We know that in today's complex healthcare system, patients and families are increasingly concerned about their ability to access and afford medical innovation. These concerns have rightfully led to calls for greater transparency in the world of healthcare, including prescription medicines. That is why Janssen Pharmaceutical Companies of Johnson & Johnson publishes its annual [Janssen U.S. Transparency Report](#), which demonstrates our commitment to responsible business practices that put patients first—including how we invest our resources, price our medicines, and help people who need Janssen medicines get access to them. We issue this report because we believe open dialogue and partnership are essential to addressing the challenges in our healthcare system. Fundamentally, we believe transparency is a positive step toward a more sustainable, results-based health system that delivers greater access to care at a more manageable cost.

**Tax Transparency:** We take our responsibility as a good corporate citizen very seriously, including paying our fair share of taxes, among them corporate income taxes, employment tax, social contributions, import and customs duties, and indirect taxes. We value and strive for cooperative and transparent relationships with taxing authorities, and we support tax policies that encourage innovation and growth. Our commitment to these responsibilities is embodied in our [Tax Policy](#).

**Policies and Positions:** We publish a comprehensive list of policies and positions covering aspects of sustainability and our ESG topics so that our stakeholders can know where we stand on important ESG issues. See our [ESG Policies & Positions webpage](#).

## Application

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

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