



Mead Johnson Nutrition Company
Standards of Business Conduct and
Ethics for Suppliers

October 2013

Mead Johnson Supplier Standards

For more than 100 years, Mead Johnson Nutrition (MJN) has earned the trust of parents and health care providers around the world. As a global leader in pediatric nutrition, we believe that it is our responsibility to conduct business in a manner that is consistent with the highest principles of moral and ethical behavior, and we expect all parties that we deal with – including our Suppliers – to hold themselves to the same high standards.

Mead Johnson's suppliers, manufacturers, contractors, joint venture partners, agents, distributors and consultants, (collectively, "Suppliers") are obligated, in all of their activities, to operate in full compliance with the laws, rules and regulations of the countries in which they operate. We require our Suppliers to comply with the expectations and standards outlined in these Standards of Business Conduct and Ethics for Suppliers ("MJN Supplier Standards"), and to communicate these standards to their suppliers and sub-contractors.

Any party that violates the MJN Supplier Standards can create serious business and reputational risk for Mead Johnson. As a result, a breach of the MJN Supplier Standards may result in serious consequences, including but not limited to, loss of existing or future MJN business.

Ethical Dealings

Compliance with Laws

Suppliers shall conduct their business in an ethical manner and act with integrity. They shall also conduct business in a fair and competitive manner in full compliance with all applicable laws, codes and regulations.

Corruption, Extortion and Embezzlement

Suppliers shall not participate in or permit any forms of corruption, bribery, extortion, or embezzlement. Suppliers shall not pay or accept bribes or participate in other illegal inducements in commercial or government relationships in order to obtain an undue or improper advantage.

Fair Business, Advertising, and Competition

Suppliers must uphold fair business standards in advertising, sales and competition.

Foreign Corrupt Practices Act

MJN expects all of its Suppliers and non-MJN employee workers to engage in ethical conduct and to comply with all foreign and domestic laws, including the United States Foreign Corrupt Practices Act ("FCPA") and similar anti-corruption laws of other countries. In accord with the FCPA, MJN prohibits the offering, promising, making, authorizing, or providing whether directly, or indirectly through third parties, of any payments, gifts, or anything of value to any government official in order to influence or reward any action or decision by such person for the purpose of retaining business or securing an improper advantage. This includes both United States and non-United States officials. In addition, MJN prohibits engaging in any act that might cause a reasonable person to infer that MJN, a Supplier or non-MJN employee worker acting on behalf of MJN, is providing an improper benefit to such government officials. For

purposes of this provision, “government official” also includes family members of any government official, former government officials, or candidates for government office.

It is imperative that any actual or suspected violations of this provision are reported to MJN immediately, by informing an attorney in MJN’s Law Department or the MJN Office of Compliance and Ethics. There may also be a requirement to periodically submit written certifications to MJN attesting to compliance with FCPA and similar anti-bribery laws.

Supplier Gifts

In order to maintain the highest standard of ethical dealings Suppliers will not offer, promise or give anything of value to any representative of Mead Johnson that might influence or be perceived as influencing such representative’s professional decisions.

Confidential Information

Suppliers must respect Mead Johnson’s intellectual property rights and safeguard confidential information by keeping it secure and limiting access to only those who have a need to know in order to do their job. The obligation to safeguard this information may be ongoing even after the business relationship ends. For further information see: <http://www.meadjohnson.com/privacy-policy>

Social Media

Suppliers shall not use any form of social media (e.g. Facebook, Twitter, YouTube, blogs, internet chat rooms, or other social and business networking sites etc.) to discuss, endorse, review, engage in, or otherwise comment on or promote its relationship with MJN or MJN’s business, products, services or programs without approval from MJN’s Corporate Communication Department. Suppliers shall not circulate, post or distribute on any social media, the Internet, or otherwise, any photo or video taken on MJN premises or any photo or video depicting MJN property or its employees without the prior written approval MJN.

Conflicts of Interest

We expect Mead Johnson employees to act in the best interest of our company and to have no personal or financial interest with any Supplier that may conflict, or appear to conflict with that obligation. We expect Suppliers to disclose to Mead Johnson any relationship they may have with a Mead Johnson employee, or the employee’s family members or close personal friends, which may create a real or potential conflict of interest.

United States Supply Chain Safety

All Suppliers shipping goods and materials to the United States shall incorporate the Customs Trade Partnership Against Terrorism (C-TPAT) program into their operations. Information about this process can be found at www.cbp.gov.

Labor and Human Rights

We expect our Suppliers to uphold the human rights of workers, and treat them with dignity and respect as understood by the international community.

Antidiscrimination

Suppliers must maintain a workplace that is free of discrimination. Suppliers shall not discriminate against any worker based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership, political affiliation or any other protected status.

Fair Treatment

Suppliers must be committed to a workplace free of harassment. Suppliers shall not threaten workers or subject them to harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, verbal abuse or other forms of physical coercion.

Child Labor

MJN Suppliers shall not employ child labor, consistent with applicable law and with the principles contained in the International Labour Organization's 1998 Declaration on Fundamental Principles and Rights at Work (the "ILO standards"), in supplying products or services to MJN. <http://www.ilo.org/ilolex/cgi-lex/convde.pl?C138>

Where the ILO standards permit the employment of workers under the age of 18 or a worker is defined as a "minor" or "juvenile" ("Juvenile Worker"), Suppliers shall comply with the requirements of any and all applicable laws which are intended to protect the Juvenile Worker from hazards that are likely to harm the health or safety of such worker.

In addition, Suppliers shall allow Juvenile Workers to complete compulsory education, comply with restrictions regulating work hours and the nature, frequency and volume of work performed, and maintain documentation sufficient to identify Juvenile Workers, including proof of age.

Voluntary Employment

Suppliers shall not use any form of forced, bonded, indentured or prison labor, inflict any physical abuse, or engage in any activity that may contribute to the phenomenon of human trafficking, including all forms of commercial sexual exploitation.

Suppliers shall not require workers to surrender any government-issued identification, original passports, travel documents, work permits or any other personal legal documents upon starting employment with the Supplier. In addition, Suppliers should not confine or restrict workers' freedom of movement. Workers are free to leave employment after giving a reasonable notice.

Regular Employment

Suppliers must, to the extent possible, see that work is performed on the basis of a recognized employment relationship established through national law and practice. Suppliers do not avoid obligations to workers provided under labor or social security laws and regulations arising from regular employment through the use of labor-only contracting, sub-contracting, home-working arrangements or through apprenticeship schemes where there is no real intent to teach skills or provide regular employment. Likewise, Suppliers do not avoid such obligations through excessive use of fix-term contracts of employment.

Wages and Benefits

Suppliers must ensure that wages paid for all hours worked meet at least the legal minimum wage or the industry benchmark standard, whichever is higher. Wages should always be enough to meet basic needs and provide some discretionary income. MJN Suppliers must provide written and understandable information about their wages before workers enter employment, and about the particulars of their wages for the pay period they are paid. In addition, we expect Suppliers not to take deductions from workers' wages as a disciplinary measure, nor take any deductions not provided for by national law without expressed permission of the worker concerned.

Working Hours

We expect Suppliers to comply with laws governing maximum work hours, vacation time, leave periods and holidays. In addition to compensation for regular hours of work, workers must be compensated for overtime hours at a premium rate in compliance with applicable laws and regulations.

Freedom of Association

Suppliers must recognize and respect the rights of employees to freely associate, organize and bargain collectively in accordance with all applicable laws. Additionally, Suppliers are encouraged to establish open communication and direct engagement between employees and management as a means by which to support positive employee relations.

Immigration Laws Compliance

Suppliers shall only employ workers with the legal authorization to work and ensure that authorization has been validated by the appropriate legal documentation.

Health, Safety, and the Environment

Mead Johnson recognizes that integrating environmental protection and personal and public health and safety into all aspects of business is essential for maintaining high morale and environmental consciousness. Suppliers must be committed to creating safe working conditions and a healthy work environment for all of their workers.

Health and Safety at the Workplace

Suppliers must eliminate physical hazards, including hazardous materials where possible. Suppliers must provide appropriate controls, safe procedures, preventative maintenance and appropriate protective equipment in compliance with all applicable laws and regulations.

Emergency Protection & Prevention

Suppliers shall anticipate and identify potential emergency situations and work to minimize their impact by implementing emergency plans and procedures, including emergency reporting, worker notification and evacuation procedures, worker training and drills, appropriate first-aid supplies, appropriate fire protection and suppression equipment, adequate exit facilities and recovery plans.

Protecting the Environment

Suppliers shall conduct their operations in a way that reduces impact on the environment, particularly in the areas of water use, energy use, green house gas emissions and waste

disposal. Suppliers are also expected to comply with all applicable environmental laws and regulations.

Compliance

Assessment of Compliance

Suppliers must maintain necessary documentation to demonstrate their compliance with these MJN Supplier Standards. In the event Mead Johnson becomes aware of conditions not in compliance with the standards Mead Johnson and/or its designated agents maintain the right to take certain actions, such as inspection of production facilities, announced or unannounced on-site audits, or review of applicable documentation, to ensure compliance with these MJN Supplier Standards. In the event any deficiencies are identified, the Supplier will take the steps necessary within an acceptable timeframe to correct any deficiency to Mead Johnson's satisfaction. Mead Johnson reserves the right to terminate an agreement with any Supplier who does not comply with the standards.

Reporting Concerns

Suppliers who believe that a Mead Johnson employee, or anyone acting on behalf of Mead Johnson, has engaged in illegal or otherwise improper conduct, to immediately report the matter or concern to Mead Johnson. The Supplier can contact Mead Johnson's Office of Compliance and Ethics:

- On line web tool: mjn.alertline.com; or
- Telephone: 877-772-6746; or
- Mail:

Office of Compliance and Ethics
Mead Johnson Nutrition Company
2701 Patriot Blvd, 4th Floor
Glenview, IL 60026

Registration of Suppliers

MJN strives to be the industry leader in ethical sourcing practices. All current and new Suppliers are required to register online by going to a database for ethical sourcing practices as specified by MJN. More information regarding this process can be obtained by contacting your procurement representative.

Access to Mead Johnson's Corporate Standards and Policies

To request a copy of the Mead Johnson Standards of Business Ethics and Conduct or related corporate policy, please contact the MJN Office of Compliance and Ethics mailbox: compliance@mjn.com or send a written request to:

Office of Compliance and Ethics
Mead Johnson Nutrition Company
2701 Patriot Blvd., 4th Floor
Glenview, IL 60026
USA

