



Mead Johnson Nutrition

Standards of Business Conduct and Ethics

January 2012



Our **Mission**
To nourish the world's children for the best start in life

Our **Vision**
To be the world's leading nutrition company for babies and children

Our **Values**
Passionate pursuit of continuous improvement in all we do
Uncompromising commitment to scientific rigor and product quality
Unwavering integrity in every relationship we have and action we take
An environment of openness, respect and high performance

Our **Core Behaviors**
Drive Performance with Focus
Communicate with Clarity
Innovate and Improve
Develop and Engage

GROWING TOGETHER EVERYDAY

A Message from Steve Golsby

Dear Colleague:

Over the last three years, Mead Johnson Nutrition has operated as a high-performing, stand-alone, public company. Our strong results and reputation reflect the powerful combination of our successful strategies, our commitment to drive performance with focus, the capabilities of our people and our unwavering integrity in every relationship we have and every action we take.

Our customers, business partners, investors and key stakeholders rely on us to demonstrate high standards in providing quality products to the marketplace, strong corporate governance, and support for protecting the environment and serving our communities around the world.

This is why I ask you to make a personal commitment to our continued success by following the company's [Standards of Business Conduct and Ethics](#) (SBCE). The SBCE was designed to provide you with basic standards and guidelines for doing the right thing – the Mead Johnson way – but it is not a substitute for good judgment, nor can it address every possible situation.

In circumstances when there is no written standard or policy, the decisions we make must use our company's Vision, Mission, Values and Core Behaviors as guideposts and be consistent with their spirit. In doing so, we will continue to earn the trust that millions of parents and healthcare providers around the world have in the Mead Johnson name and the products we provide.

Thank you for your ongoing professionalism and dedication to ethical conduct in every aspect of our business.



President and Chief Executive Officer

Standards of Business Conduct and Ethics

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Introduction

The Standards of Business Conduct and Ethics are intended to provide you with general guidance on conducting business in a compliant and ethical manner. These Standards do not provide a complete explanation of all the laws, regulations, policies and procedures that MJN employees must follow.

You are responsible for understanding and following all applicable Mead Johnson Nutrition policies and procedures, including the Standards of Business Conduct and Ethics. If you have any questions about interpreting or applying these Standards, or any other policy or procedure, you should contact the Law Department or the Office of Compliance and Ethics.

The Standards of Business Conduct and Ethics apply to Mead Johnson Nutrition Company and all its subsidiaries (collectively “MJN”), and all MJN employees. Any employee who violates these Standards can create serious risk for our Company and may be subject to disciplinary action, including the termination of employment. Some violations of the Standards can also subject our Company or individual employees to severe penalties, including imprisonment, civil fines and administrative sanctions.

Nothing contained in the Standards of Business Conduct and Ethics is intended to confer, nor shall it be construed to confer, any contractual right, either expressed or implied, to remain in the Company’s employment. Furthermore, the Standards of Business Conduct and Ethics do not guarantee any fixed terms and conditions of employment.

Compliance and Ethics

MJN Office of Compliance and Ethics

We are firmly committed to compliance with local, state and federal laws, rules and regulations of the United States; the laws, rules and regulations of other countries where our Company does business; and our own policies and procedures. We have an effective global compliance and ethics program that is led by our Office of Compliance and Ethics and supervised by Senior VP, General Counsel and Corporate Secretary.

Reporting Concerns

Every employee must promptly report all concerns about business practices or individual misconduct to at least one of the following:

- the Office of Compliance and Ethics;
- their supervisor;
- an attorney in the Company’s Law Department;
- a Human Resources representative.



The types of concerns that must be reported include potential violations of law, unethical behavior, suspicions of fraud, noncompliance with the Standards of Business Conduct and Ethics or accounting matters.

Any employee who becomes aware of, or has reason to suspect, activity of any other employee that is criminal or potentially criminal in nature, or an activity that may involve someone being in danger, is required to report such activity immediately to the Office of Compliance and Ethics. Failure to make such a report is a violation of these Standards and may be subject to disciplinary action up to and including termination of employment.

Employees can report concerns anonymously and confidentially using the MJN Integrity Line. The Integrity Line is managed by an organization independent from MJN which helps businesses maintain high ethical standards. Those who choose to identify themselves are assured that MJN will not discharge, demote, suspend, threaten, harass or in any manner retaliate against any employee for reporting a concern in good faith. Confidentiality will be maintained to the extent possible in light of the Office of Compliance and Ethics' responsibility to fully investigate reported concerns about business practice or individual misconduct.

Employees may contact the MJN Integrity Line

On line web tool: mjn.alertline.com

Telephone: 877-772-6746

The telephone number above is toll free in the U.S. and Puerto Rico. The number can be called toll free from any country by first dialing the AT&T toll free access number for that country. See the last page of this document for a list of toll free International access codes:

Mail:

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

The translation of calls and letters is available.

Treatment of Reported Concerns

Upon receipt of a reported concern, the Office of Compliance and Ethics will determine whether to initiate an investigation to gather necessary information and evaluate the circumstances. Prompt remedial action will be taken, as appropriate. The resolution of investigations will be communicated to persons making reports where possible and appropriate.

Tracking and Retaining Reports and Investigations

The Office of Compliance and Ethics maintains records of all reported concerns that result in investigations, the investigation activities, and the resolution of the investigation. These investigation records are maintained in accordance with our records management policy.

Accounting Matters

Any MJN employee or a third party may also report a concern regarding any accounting, internal accounting controls or auditing matters (collectively, “accounting matters”) directly to the Audit Committee of the Board of Directors, by sending a letter to:

Chair, Audit Committee
Mead Johnson Nutrition
2701 Patriot Blvd., 4th Floor
Glenview, IL 60026

Specific accounting matters that must be reported include:

- fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of MJN;
- fraud or deliberate error in the recording or maintaining of financial records of MJN;
- noncompliance with our Company's internal accounting controls;
- misrepresentation or false statement to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports or audit reports of MJN; or
- deviation from the full and fair reporting of the financial condition of MJN.

Reports submitted in this manner will be forwarded, unopened, directly to the Chair of the Audit Committee. In order for this reporting process to operate effectively, it is important that reports provide enough detail to allow for a thorough review. Important details include a full description of the matter, an approximate date of the alleged event and the business unit and/or persons involved, if applicable.

All reports relating to accounting matters will be investigated under the direction and oversight of the Audit Committee and any other persons the Audit Committee determines are appropriate. Prompt corrective action will be taken, as appropriate, in the judgment of the Audit Committee.

Auditing and Monitoring

Periodically, the Company will audit and monitor compliance with the Standards of Business Conduct and Ethics. Employees must cooperate fully with these reviews and provide truthful and accurate information.

Compliance is everyone's responsibility. It begins with each of us.

Our People

Employee Relations

All employees are treated fairly and with respect.

In this spirit, we do not tolerate discrimination or harassment of any kind in the workplace. We expect the workplace to be free of unlawful bias, prejudice and discrimination. In addition, we do not tolerate unprofessional behavior, such as the use of offensive language.

We do not tolerate threats or acts of violence in the workplace.

Data Privacy

In the normal course of business our Company receives, collects, maintains and uses significant amounts of personally identifiable data from individuals related to their financial, medical and benefits information. Some of these data may include sensitive information that may pertain to a person's health. The data may relate to employees, customers, consumers, research subjects, vendors and competitors.

Regardless of the subject of the data, you must respect and protect the personal information to which you have access, in a manner consistent with applicable laws.

Environment, Health and Safety

Our Company carefully considers the health and safety of its employees, customers and the general public. Each of us is responsible for maintaining a safe workplace and complying with all applicable laws, regulations, and Company policies.

We conduct our business in an environmentally responsible manner and maintain systems, programs and procedures for the environmentally responsible management of:

- research and product development;
- manufacturing operations;
- packaging;
- transportation and distribution;
- marketing and sales; and
- contracted goods and services.

You should consider environmental protection, as well as personal and public health and safety as inseparable parts of your everyday responsibilities.

Our Company

Accurate Books and Records

Our Company maintains its books and records to accurately reflect the true nature of its business transactions. We do not create or participate in creating records that are misleading or conceal inaccuracies. Each of us is responsible, within our respective jobs, for the accuracy of the financial records we create.

For example, this means that you must not:

- make records that appear to show payments to one person or entity when, in fact, they are made to another;
- create records that contain false dates or signatures;
- submit expense accounts that fail to reflect accurately the type and amount of expenses;
- create records that fail to reflect accurately the nature of the transactions; or
- record sales that do not actually occur.

If you have a concern regarding activities which may lead to inaccurate books or records, including accounting issues, internal controls or auditing matters, you should immediately report your concern to either your supervisor, the Law Department, the Office of Compliance & Ethics, or directly to the Audit Committee.

Records Management

A record is any recorded information created, received, modified, maintained, archived, retrieved or transmitted that supports our business activities. This includes paper, microfilm, e-mail messages, photographs, electronic and digital records (CDs, computer tapes, disks, etc.), and Word, Excel and other documents.

Our records management program establishes uniform and consistent records management practices, including how long records should be kept and when they should be disposed.

All records that relate to your work are the property of MJN. No employee has a personal or property right to MJN records, including those records an employee authored or helped develop or compile.

You are responsible for ensuring that Company records are maintained, used, transferred and disposed of according to the MJN Records Management Policy.

Government Investigations and Other Legal Matters

We cooperate fully with government investigations, inquiries and litigation requests.

When you know, reasonably believe, or have been notified that an investigation, inquiry, or litigation is ongoing or reasonably foreseeable, you must retain and preserve all related documents (hard copy, electronic, and digital).

You must properly retain documents and never:

- destroy Company documents (i) if there is a reasonable likelihood they will be subject to an investigation or litigation, (ii) after receiving notice to retain such documents or (iii) after receiving requests for the documents from a government agency, court or the Law Department;
- alter Company documents or records;
- lie or make misleading statements to a government investigator or any member of Company management; or
- attempt to keep any person from giving information to a government investigator or Company attorney, or attempt to induce anyone to offer false or misleading information.

Employees in the United States and certain other countries may have a right to be represented by an attorney if government investigators contact them. If you are unsure of your rights, contact the Law Department.

Protecting Confidential Information

Confidential information is any information relating to the Company's products, business or activities that is not publicly available and that may be of value to the Company, its competitors or other entities.

Our Company generates a great deal of information, and employees are expected to know which information is confidential and should not be shared outside the Company. Inappropriate disclosures of confidential information may destroy the information's value, harm our Company's competitive position, violate laws, or affect our contractual obligations. We are each responsible for ensuring that confidential information is handled, maintained and disposed of according to Company procedures.

Some of the most common examples of MJN confidential information include:

- financial data;
- research data, prior to its authorized disclosure by the Company;
- marketing and sales figures for products or product groups;
- plans for marketing or product development;
- plans for acquisition or divestiture of businesses or products;
- manufacturing processes;
- customer and supplier lists;
- supplier pricing for our Company;

- Company organizational charts; and
- employee lists.

To protect our confidential information from inappropriate disclosure:

- it should not be disclosed to non-employees without appropriate, prior approval;
- it should only be discussed with other MJN employees on a need-to-know basis;
- our vendors should be required to sign a confidentiality agreement before we discuss any non-public information with them, and they should be reminded that they may only use the information for the purpose of conducting business with us;
- we should use caution to avoid inadvertent disclosure at all times and in all settings, including in social interactions; and
- we should use caution in discussing Company business outside of the office.

We also want our business partners to be confident that we will protect their confidential information from inappropriate disclosure. When receiving and handling another party's confidential information:

- you should not accept the information unless there is a written confidentiality agreement covering the exchange of information; and
- you should not use any illegal or improper actions to acquire another party's confidential information.
- you should contact the Law Department before using or forwarding any confidential information about another party that the party may not have intended MJN to receive.

Disclosure of Material Nonpublic Information, Insider Trading and Securities Laws Compliance

Disclosure of Material Nonpublic Information

The way in which we handle material nonpublic information, as well as the conduct of our employees who are exposed to this information, are controlled by law and by Company policy.

You must not disclose material nonpublic information about MJN or the companies with whom we do business to anyone inside or outside the Company who is not authorized to receive the information.

You should take particular care with the following types of material nonpublic information:

- internal financial information;
- commencement of a new business venture;
- development, approval or a lack of approval of a new product or innovation;
- contemplated acquisition of another company or disposition of an existing business to another company; or
- the initiation or termination of significant litigation.

Insider Trading and Securities Laws Compliance

If you possess material nonpublic information, you are prohibited from profiting from it, for example, by buying or selling Company securities. Securities include, but are not limited to, shares of stock, stock units, stock options, notes and debentures.

Likewise, anyone with knowledge of material nonpublic information about companies with whom MJN does, or is considering doing, business may not buy or sell the securities of those companies.

If you are uncertain about any of these rules contact the Corporate Secretary or the Law Department before making any securities purchases or sales.

Corporate Communications

In conducting our business, MJN employees communicate regularly with customers, healthcare professionals, government officials, financial analysts, the press, and other important external contacts. To ensure that we communicate in a thoughtful and appropriate manner, it is essential to work with Corporate Communications, the Law Department, and Investor Relations, as follows:

- all written and oral communications for external audiences that discuss general information about our business (in speeches, press releases, presentations, and other similar materials) must be reviewed and approved by Corporate Communications prior to release to ensure accuracy and consistency;
- all communications to the investment community also must be reviewed and approved by the Law Department and then by Investor Relations;
- all press inquiries about MJN and its brands must be directed to Corporate Communications. If other external inquiries are directed to Corporate Communications, such as from an investor, Corporate Communications will then refer the inquiry to Investor Relations or another part of the Company as appropriate;
- all requests by third parties for public endorsements, statements of support by the Company, or descriptions of its relationship with the Company or one of its employees, must be approved in advance by Corporate Communications;
- all inquiries about a pending legal matter or other sensitive issues should be referred to the Law Department. However, if the inquiry is from the media, it should be referred to Corporate Communications; and
- all requests by third parties to use the “corporate signature” or logo in any form must be approved in advance by Corporate Communications. In addition, if you are uncertain whether



your planned use of the corporate signature inside MJN is appropriate, please contact Corporate Communications.

Internal communications, including, but not limited to, Executive Staff Bulletins, Sales Force Field Communicators, Mass Mailers and News Flashes, and executive speeches and presentations (unless the speech or presentation was delivered in a public forum) must not be forwarded outside MJN.

Conflicts of Interest

We must avoid situations that present or create the appearance of a potential conflict between our private interests and those of the Company.

A conflict of interest exists when your private interests, including personal, social and financial, interfere in any way with the performance of your responsibilities to the Company. For example, a conflict may arise if you or a family member receive personal benefits, have personal relationships, or have financial or business dealings that make it difficult to perform your job objectively. Even the appearance of a conflict of interest can damage the Company's reputation, as well as your own. You must disclose the details of any potential conflict of interest that exists and seek approval for an exception to Company policy.

While there are many situations which may create a potential conflict of interest, the following represent the most common types of conflicts which you may face, as well as specific situations that all employees should avoid:

Personal Financial Interests

- a financial interest in any entity with which the Company does business, or which competes with the Company (for example suppliers, customers and competitors), if that interest would present a conflict or appear to present a conflict with your employment;
- ownership of more than one percent (1%) of the securities of any publicly traded entity with which the Company does business;
- receiving fees, commissions or other compensation from any entity with which the Company does business; and
- a financial interest in any transaction in which it is known that MJN is, or may be, interested.

Outside Activities

- outside business activities that compete with any Company business;
- outside activities that affect your ability to devote appropriate time and attention to your assigned job responsibilities; and
- service on the board of directors of any outside entity, unless such service is approved, in advance, by the Company.

Gifts, Entertainment, Gratuities and Other Favors

You must never accept a gift that might influence or be perceived to influence your professional decisions.

Accepting gifts, entertainment, hospitality, gratuities or other favors from entities with whom we do business is generally not acceptable because it may pose a conflict of interest by appearing to influence an employee's judgment. Employees should consult with a supervisor, the Law Department, or the Office of Compliance and Ethics for guidance on these matters.

Gifts

You must not accept or provide a gift unless it is:

- of nominal monetary value, as specified in local procedural documents;
- not intended and could not be perceived by others to improperly influence business decisions; and
- consistent with industry practices, all applicable laws and all Company policies and procedures.

Entertainment

Occasionally for the purpose of building relationships, you may accept or provide social entertainment or hospitality, such as modest meals or event tickets. However, you must not accept or provide entertainment or hospitality unless it:

- permits business or educational discussions at the meal or event;
- is part of a genuine business relationship;
- is not intended and could not be perceived by others to improperly influence business decisions;
- is consistent with industry practices, all applicable laws and our Company policies and procedures;
- is not excessive in price or quantity, as defined by local procedural documents; and
- would not embarrass our Company if it was brought to public attention.

Honoraria

There may be times when you are asked to speak at a seminar, symposium or other meeting on a topic related to your business expertise or on a topic related to our Company's business. You usually may do so as official Company business if you have approval from your supervisor, you do not disclose confidential information of MJN, and the activity is aligned with Company business objectives.

Occasionally, speakers are offered speaking fees or other honoraria. Generally, you may not accept an honorarium for speaking or making a presentation when conducting official Company business. You should immediately consult with your supervisor and, if necessary, the Law

Department or the Office of Compliance and Ethics if you are offered an honorarium to speak at a seminar, symposium or other meeting.

Doing Business with Government Employees

It is important to remember that sometimes the healthcare professionals, customers, and others with whom we do business are government employees. Before offering or accepting any gifts, gratuities, entertainment, or hospitality to or from a government employee, you should consult with the Law Department. Laws concerning this matter are often complex and vary from country to country, and, often from state to state.

Use of MJN Property or Services for Personal Benefit

In general, you should not use MJN property or services for your own or another's personal benefit. Sometimes the line between personal and Company benefit may be difficult to determine since activities sometimes create both personal and Company benefits. In such cases, you should seek approval from your supervisor when using Company property or services that do not solely benefit our Company.

Business opportunities, ideas or innovations, whether patentable or not, that are discovered or developed through the use of MJN property or information, or through your position with MJN, must not be used for your personal benefit.

Use of Company Computers and Networks

Our Company uses global electronic communications as a routine part of our business activities. However, this type of communication can present risks. Therefore, it is essential that we carefully manage our use of these electronic communications to ensure that our computer systems are accessible for business purposes, that they are operated in a cost-effective manner, that our Company's reputation is protected, and that we are not subject to increased legal risk.

Generally, you must restrict your use of our computer resources to authorized business purposes. Only brief, incidental uses for personal reasons are permitted. You must not use Company computer resources to view, download, copy, electronically distribute or otherwise access:

- material that is discriminatory or disparaging of others based on gender, race, sexual orientation, age, national origin, religious or political beliefs or any other protected characteristic;
- pornographic or sexually oriented materials;
- gambling sites or gambling-related materials;
- material that advocates illegal activity; or
- articles, artwork, photographs, music, files, data, software or other materials or information that may be protected by copyright, nor otherwise use such copyrighted information in a way that violates copyright laws.

When sending, storing or posting information by e-mail, instant messaging, internal blogs, social networking sites, Wikis, or other computer and networking tools, you must always do so with appropriate business-like language and tone. You must not use Company computer systems to send electronic communications that:

- use language that might be considered obscene, sexually-oriented, derogatory, offensive, threatening, insulting, harassing, slanderous, libelous and/or defamatory;
- discriminate against or disparage others based on gender, race, sexual orientation, age, national origin, religious or political beliefs or any other protected characteristic;
- include chain letters, junk mail or similar mailings;
- represent a user's personal opinion to be that of the Company;
- solicit or promote a religious, charitable, political or other non-business related cause, unless authorized by the Company;
- promote any private commercial enterprise or business venture;
- damage the Company's reputation, or that of its products or services;
- are libelous or defamatory of any other company's reputation, products or services; or
- discuss Company business in chat rooms, bulletin boards, blogs, newsgroups, etc.

We monitor computer use by employees, including Internet and e-mail use. Monitoring is conducted for a variety of reasons, including managing our Company's computer network, assurance of system security, and verification that employees are complying with Company policy. Violation of Company policy may result in restriction or termination of access to the Company's computer resources and other disciplinary action including termination of employment.

Our Business

Fair Competition

Competition laws, also called antitrust, monopoly, fair trade or cartel laws, are designed to maintain a free, open and competitive marketplace. Under these laws, it is usually illegal for competitors to agree, directly or indirectly, on various subjects, including:

- prices or margins for products;
- discounts for products;
- terms and conditions of sale for competing products;
- prices paid to suppliers for products or services;
- territories in which to sell products;
- customers to whom products are sold;
- product types, product lines or quantities that companies can produce or sell; or
- matters related to competitive bids.

You must not discuss the above topics with competitors, or participate in or attend any meeting where these topics are discussed by competitors.

Listed below are a number of activities that raise extremely sensitive and complex legal issues. Each is described in more detail in the Related Policy named below. Some of the activities listed are not permitted and others may only be permitted in certain circumstances. Therefore, you should consult with the Law Department, in advance, regarding:

- predatory practices and attempting to monopolize a market;
- tying, bundling and reciprocity arrangements;
- restrictions on Company distributors, such as establishing a minimum price that a distributor must charge for our products;
- discrimination in pricing or promotions, such as charging different prices for our Company's products to similarly situated customers;
- boycotting practices, for example persuading another company not to do business with a competitor;
- restrictions on dealing in goods of a competitor, for example conditioning sales of Company products on a customer's refusal to deal with our competitors;
- ending a long-standing business relationship, for example, with long-term Company distributors;
- granting or relinquishing patents or patent licenses;
- joint or team bidding, or any joint venture or co-marketing arrangement;
- acquiring any company, product or group of assets;
- beginning or settling legal action such as a patent infringement suit against other companies or individuals; and
- comparing proprietary information with competitors such as cost information or participating in other forms of benchmarking.

Purchasing Practices

MJN purchases goods and services solely on the basis of price, quality, safety and the value they provide.

Our Global Procurement organization has responsibility for the process of purchasing all materials, equipment and services covered by the Purchasing Policy.

Each business unit is responsible for identifying its business needs, justifying the expenditure of Company funds to purchase the goods and services that will fulfill those needs, and ensuring the appropriate contracts are signed in connection with and prior to the purchase of those goods and services.

Global Procurement, acting on behalf of the business unit and our Company, will lead the process of identifying eligible suppliers, communicating the business unit requirements and soliciting supplier proposals. Global Procurement creates an environment of competitive alternatives and leads the negotiation of price, terms and conditions prior to the execution of the transaction.

Global Procurement will work with you to select suppliers on the basis of the total value they will provide to our Company. Suppliers who are also Company customers will receive no advantage in Company purchasing decisions. Purchases and sales should be viewed independently and analyzed solely on the basis of their impact on our Company's business.

Marketing Practices

All of our Company's products are sold solely on the basis of their price, quality, efficacy and safety.

Advertising must be truthful, and specific claims must be fair and substantiated. We do not engage in deceptive advertising or unlawful promotional activity. Materials that are created for use in marketing and selling our products must be reviewed and approved as required by applicable policies before their use.

You should discuss the implications of any of the following practices with the Law Department, if applicable:

- advertising and promotional allowances (for example, rebates and discounts);
- comparisons of Company products to our competitors' products; or
- use of Company trademarks and trade names.

In most countries, including the United States, the law prohibits healthcare companies from marketing their products by giving improper incentives to the customer. Improper incentives may include entertainment, trips, gifts and fees paid with the purpose of influencing the customer's purchasing or prescribing decisions. Our Company's marketing practices prohibit giving illegal incentives to our customers.

Reporting Medical Events

We are committed to protecting the health and safety of our consumers. Therefore, our Company monitors and evaluates medical events associated with our products. A medical event is any sign, symptom or illness associated in timing with use of a product, whether or not a causal relationship is demonstrated. Overdoses and refusal are also considered medical events.

To ensure we meet our worldwide safety reporting requirements, you must promptly report any medical events associated with any of our products when you become aware of them.

International Business

We observe the highest ethical standards in all of our business transactions. We often set our standards for corporate behavior beyond the requirements of the law. In addition to observing all local, state, federal and country laws and regulations, you must uphold our Company's ethical standards, even if they are more demanding than local customs or practices.

Payments to Government Officials

You must not offer, promise, make, authorize or provide, directly or indirectly through third parties, any payments, gifts, or anything of value to any government official, including family members of the official, and former officials, in order to influence or reward their actions or decisions in connection with their official capacity, for the purpose of obtaining or retaining business or securing an improper advantage. This is consistent with the U. S. Foreign Corrupt Practices Act (FCPA) and local anti-bribery laws. In addition, you must not engage in any act that might cause a reasonable person to believe that our Company is providing an improper benefit to government officials.

Sometimes the healthcare professionals or customers with whom we do business are government officials. Government can include persons who receive compensation from any government entity for performing some services (such as a government payment for providing health care). Before offering or accepting any gifts, gratuities or entertainment to or from a government official, you should consult the Law Department. Laws concerning this matter are often complex and vary from country to country.

Anti-Boycott Laws

Our Company complies with U.S. laws which prohibit participating in the economic boycotts of certain other countries. We cannot refuse to do business with firms in these countries for reasons of boycott.

In addition, our Company must report to the U.S. government if we receive certain requests for information, declarations or other statements relative to such boycotts. Participation in certain boycotts may also violate laws of other countries. Any questions about this topic must be referred to the Law Department.

Embargoes and Other Trade Restrictions

The laws of the United States and other countries where our Company does business prohibit or restrict direct or indirect dealings with certain countries. They may also restrict our dealings in certain countries with individuals, and companies controlled by the government. U.S. law also prohibits or restricts dealings with certain parties identified by the U.S. Department of Commerce and the U.S. Department of the Treasury. Proposed new vendors are checked against the prohibited and restricted list. MJN will not engage in any prohibited transaction.

Political Activity

Our Company encourages active participation in the political process. However, you must not:

- use working time for political purposes;
- request reimbursement for any political contributions; or
- use Company time, property or facilities for political activity.

You should direct questions to the Law Department before doing anything involving our Company in any political activity in the United States and other countries. You may, of course, volunteer for political purposes, but your services must be offered during personal time only and without using MJN's name or assets.

United States federal laws restrict use of corporate funds for federal elections and some states have similar laws. This is a complex and highly regulated area.

Standards of Business Conduct and Ethics

Corporate Policies

A paper copy of any of the corporate policies can be obtained by sending a written request to:

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



Mead Johnson Nutrition Integrity Line Telephone Numbers

Calling Instructions and Worldwide Access Numbers

For global toll free access, enter the access number (listed below) for the country you are calling from. When you hear the English-language message or a series of prompt tones, enter the MJN Integrity Line telephone number: **877-772-6746**. (Do not press "0" or "1" before entering the MJN Integrity Line telephone number).

Country	ATT Toll Free Access Codes
Argentina	0800-555-4288
Australia	1-800-881-011 or 1-800-551-155
Belgium	0-800-100-10
Brazil	0-800-888-8288 or 0800-890-0288
Canada	1-800-225-5288
Chile	800-225-288 or 800-360-311
China	108-888 or 108-11
Colombia	01-800-911-0010
Denmark	800-100-10
Dominican Republic	1-800-872-2881
Ecuador	1-999-119 or 1-800-225-528
France	0-800-99-0011
Guam	1-800-225-5288
Hong Kong	800-96-1111 or 800-93-2266
India	000-117
Indonesia	001-801-10
Ireland	1-800-550-000 or 00-800-222-55288
Italy	800-172-444
Malaysia	1-800-80-0011
Mexico	01-800-228-2872 or 001-800-462-4240
Netherlands	0800-022-9111
Norway	800-190-11
Peru	0-800-50-288 or 0-800-70-088
Philippines	1010-5511-00 or 105-11
Poland	00-800-111-1111
Portugal	800-800-128
Puerto Rico	1-800-225-5288
Russia	
from within Moscow & St. Petersburg	363-2400
from other cities in Russia	8^10-800-110-1011 or 8^495-363-2400
Singapore	800-011-1111 or 800-001-0001
Singapore	800-011-1111 or 800-001-0001
Spain	900-99-0011
Sweden	020-799-111
Taiwan	00-801-102-880
Thailand	1-800-0001-33
United Kingdom	0-800-89-0011 or 0-500-89-0011
United States	1-800-225-5288
Venezuela	0-800-225-5288
Vietnam	1-201-0288