

Anti-Corruption and Anti-Bribery Position

Introduction

As a global and socially responsible company, Kenvue is committed to conducting business around the world with integrity and the highest ethical standards. As such, we oppose corruption and bribery in all of its forms. Our Code of Conduct and our core values of putting people first and earning the trust of our customers and business partners, live at the heart of this Anti-Corruption and Anti-Bribery position.

Engaging in bribes or corruption violate the U.S. Foreign Corrupt Practice Act (FCPA), anti-money laundering laws, local and regional anti-corruption laws, and other local and foreign laws and regulations. Not only are such activities unlawful, but they can harm consumers, violate fair competition, and lack transparency. Our products should always be chosen freely based on their merits and not as the result of an inducement.

Kenvue has a zero-tolerance policy on bribery and corruption. We take all reasonable steps to ensure Kenvuers and third-party partners understand and abide by company expectations and requirements, and conduct themselves in accordance with the highest ethical standards at all times.

Anti-Corruption and Anti-Bribery Principles

Value Transfers

Kenvue will not offer, promise, or give anything of value to a healthcare professional (HCP), government official (GO), or private person in return for a business advantage, nor will we ask for or accept anything in return for Company business. Examples of prohibited activities include:

- Fraudulent conduct such as kickbacks, facilitation payments, and other illegal payments
- Charitable donations made in exchange for business
- Company job appointments for an individual or their family member in exchange for a benefit to the Company

In many markets there are also anti-corruption and anti-bribery laws. For example, as a US headquartered company, we must comply with the US Foreign Corrupt Practices Act (FCPA) and the anti-corruption laws of the other countries in which we do business.

Kenvue has implemented internal controls at all levels of the organization to ensure compliance with anti-corruption and anti-bribery laws. We audit and refine these internal controls on an ongoing basis. Continuous monitoring includes documentation of existing accounting, books and records, and internal control systems, evaluation procedures, and risk assessments.

Engagements with HCPs and GOs

Globally there are laws and regulations that govern interactions with GOs. GOs may also be subject to special ethics rules, disclosure obligations, and conflict of interest provisions depending on the jurisdiction. Examples of interactions with GOs include lobbying activity and interactions with regulators and inspectors.

Because some GOs and HCPs may be able to influence the purchase and use of Kenvue products, it is important to avoid real or perceived conflicts of interest that would interfere with them performing their official duties, and in the case of HCPs, their clinical judgement. Any funding or payment to an HCP, GO, or a health care organization or government entity (e.g., contractual arrangement) must never be conditioned on the current or expected future purchasing or recommendation of our products. Because of these special considerations, Kenvue closely reviews relevant business activities before engaging in certain interactions with or projects involving an HCP and/or GO (especially when it involves a value transfer, including gifts and hospitality).

Third Party Intermediaries

From time to time, Kenvue may contract with third party intermediaries to conduct activities and make payments on its behalf. Under the FCPA and other anti-corruption laws, Kenvue can be held responsible for improper payments or other value transfers by anyone acting on behalf of the Company if the Company knew or reasonably should have known that the activity was improper.

As such, Kenvue takes proper due diligence measures prior to engaging third parties such as business justification and an information questionnaire. Kenvue also informs third parties that they are prohibited from engaging in corrupt activity on the Company's behalf. Kenvue monitors its third parties via a risk-based management process and investigates any wrong doing and takes appropriate corrective action as needed.

Books and Records

Company books and records will accurately reflect the transactions that occur and must never be falsified to disguise corruption or bribery. The Company:

- Establishes and maintains adequate internal accounting controls
- Keeps records sufficient to prepare financial statements consistent with generally accepted accounting principles
- Assures that all corporate assets are properly controlled and accounted for, including performing proper review of expense reports

Kenvue ensures that invoices received from third parties accurately describe the underlying services and have sufficient detail to enable compliance with the above requirements.

Political, Community, and Charitable Contributions

Kenvue believes in contributing to the communities in which it does business, and permits donations to community projects, local and foreign charities, and other qualified recipients. Before making a contribution, the Company verifies that donations to foreign-based charities and other recipients are not disguised illegal payments to foreign officials in violation of anti-corruption laws.

Risk Assessment

Kenvue conducts regular risk assessments of the business activities it engages in around the world. These risk assessments consider current company activities that may be associated with bribery and corruption risk, emerging risks based on future business plans, the evolving legal and regulatory environment, and the corruption index in local markets where business activities take place.

The results of these risk assessments are a key input into the Compliance Office's priorities. As risks are identified, the Compliance Office, in alignment and partnership with the relevant business leaders, develops and implements mitigation plans. These plans may include strengthening policies and procedures, conducting additional training and education, performing follow-up auditing and monitoring, implementing governance strategies, and establishing management action plans.

The risk assessment process minimizes Company corruption risk by continually improving and strengthening the Compliance program, fostering strategic alignment between Compliance and the business, allowing for risk-based adjustments to compliance program priorities and allocation of resources, and providing leadership with line of sight into Company risk areas. Any discovery of potential non-compliance or unlawful activities resulting from the risk assessment process will be immediately investigated and completed in a timely matter.

Reporting

The Company has established the Kenvue Integrity Line (www.KenvueIntegrityLine.com) where suspected or known prohibited or unlawful activity may be reported in a safe and anonymous manner. Reports can be made either online or by phone, 24 hours a day / 7 days a week, and is available in multiple languages.

Conclusion

There are penalties for individuals and companies that violate anti-corruption and anti-bribery laws. For individuals, this may include fines, debarment from certain interactions with governments, imprisonment, and Company disciplinary action up to and including termination. Companies may face fines and debarment as well.

Kenvue aims to be a responsible and ethical company. Our brands are among the most recognizable in the world, and our continued success depends on maintaining the trust and confidence of our customers, consumers, and business and government partners. As such, we prohibit bribery and corruption in all its forms, and are committed to adhering to the principles set forth herein, which form the basis for Company anti-corruption and anti-bribery policies and procedures.