



Company Engagement Questions:
KnowTheChain Food & Beverage benchmark

Name of company: Mead Johnson Nutrition Company

Name of respondent: Chris Perille

Position of respondent: Vice President, Corporate Communications and Public Affairs

Respondent's contact information (email): chris.perille@mjn.com

Note: For companies with vertically integrated supply chains, any reference to 'suppliers' in the following questions includes manufacturing and production sites owned by the company.

Documents

1. Please share links to any policy statements, reports, or other documents that you would like to be taken into account in a review of your company's approach to managing forced labor risks in the supply chain.

Note: You may be aware that the [Corporate Human Rights Benchmark \(CHRB\)](#) is analyzing companies' broader human rights policies and performance. Where the KnowTheChain benchmark indicators are related to [indicators of the CHRB](#), this is indicated under each engagement question.

We welcome that some companies have disclosed information on their human rights policies and practices for the [Corporate Human Rights Benchmark \(CHRB\)](#). Where companies have disclosed information on specific CHRB indicators, as well as any links available from the company website, these will be considered in the KnowTheChain analysis. Third party information and links to third parties' websites will not be considered.

Please use the following links for information about Mead Johnson's approach to managing forced labor risks:

[Mead Johnson Standards of Business Conduct and Ethics](#)

[Standards of Business Conduct and Ethics for Suppliers](#)

[Mead Johnson Nutrition Responds to California Transparency in Supply Chains Act \(SB 657\) on \[mjn.com\]\(http://mjn.com\) and \[enfamil.com\]\(http://enfamil.com\)](#)

Commitment and governance

Awareness and commitment

2. Has your company made a formal commitment (e.g. adopted a policy) to address human trafficking and forced labor? Please include a link to the commitment.

Related to indicator A.1.2 of the CHRB

Please use the following links indicating our commitment to address human trafficking and forced labor:

[Standards of Business Conduct and Ethics for Suppliers](#)

[Mead Johnson Nutrition Responds to California Transparency in Supply Chains Act \(SB 657\)](#)

[Mead Johnson Standards of Business Conduct and Ethics](#)

Supply chain standards

3. Does your company have a supply chain standard that requires suppliers to uphold workers' fundamental rights and freedoms, including the elimination of forced labor? Please include a link to the standard, and provide information on how frequently the standard is updated.

Related to indicator A.1.2 of the CHRB

Please use this link to [Standards of Business Conduct and Ethics for Suppliers](#)

The document is updated as needed.

Management

4. Who within your company is responsible for the implementation of your company's supply chain policies and standards relevant to human trafficking and forced labor? Please indicate the committee, team or officer, and describe the scope of their responsibility and how they interact with other internal teams, groups or departments

Related to indicator B.1.1 of the CHRB

Use this link to [Mead Johnson Standards of Business Conduct and Ethics for the following information](#) (pg 7 of 42):

Audit Committee of the Board of Directors

Chair, Audit Committee

Mead Johnson Nutrition Company

2701 Patriot Blvd., 4th Floor

Glenview, IL 60026

Please use this link to [Standards of Business Conduct and Ethics for Suppliers](#) for the following information:

*“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** (emphasis ours). There may also be a requirement to periodically submit written certifications to MJN attesting to compliance with FCPA and similar anti-bribery laws.” (Pg 6 of 7)*

Please use this link to Mead Johnson [RISK MANAGEMENT & COMPLIANCE COMMITTEE CHARTER](#)”

“The purpose of the Committee is to provide oversight of the Company’s risk management and compliance programs. As such, the Committee will be responsible for review of the effectiveness of management’s processes for (a) identifying, assessing, mitigating and monitoring enterprise-wide risks and (b) implementation and administration of the Company’s ethical policies and programs, including the Standards of Business Conduct and Ethics.” “The Committee shall consist of two or more non-employee directors of the Company recommended

by the Nominating and Corporate Governance Committee and appointed by a majority of the full Board by resolution or resolutions. The majority of the Committee shall be independent.” “The members of the Committee shall serve until such member’s successor is duly appointed and qualified or until such member’s resignation, retirement or removal by a majority vote of the Board.”

Training

5. Does your company conduct training programs for internal decision-makers and suppliers’ management teams on risks, policies and standards related to human trafficking and forced labor (this may include training on elements such as passport retention, payment of wages, and vulnerable groups such as migrant workers)? Please describe.

Related to indicator B.1.5 (internal training) and B.1.7 (training of suppliers) of the CHRB

Yes – Please use these links to Mead Johnson Nutrition Responds to California Transparency in Supply Chains Act (SB 657) on mjn.com and enfamil.com for the following information:

“Training

One hundred percent of MJN employees are required to complete an annual training on the SBCE and acknowledge compliance with the SBCE. In addition, key supply chain personnel, including management, receive additional training on MJN’s Responsible Sourcing program presented by an external subject matter expert on an as needed basis.”

Please use this link to [Mead Johnson Standards of Business Conduct and Ethics](#) for the following information:

“Make sure that the Code of Conduct is communicated to all those who work for you and that employees receive appropriate training on this Code of Conduct and Company policies that impact their job duties.” (Pg 6 of 42)

Stakeholder engagement

6. In the last three years, has your company engaged on human trafficking and forced labor, especially as it relates to the supply chain a) with local stakeholders such as NGOs, trade unions or policy makers or b) in multi-stakeholder initiatives? Please describe with whom your company has engaged, the purpose of the engagement and how it relates to forced labor and human trafficking in the supply chain, and your company’s role and level of engagement.

Related to indicator A.1.4 of the CHRB

N/A

Traceability and risk assessment

Traceability

7. Please describe your company’s supply chain tracing processes. Does your company publicly disclose a) the names and locations of first-tier suppliers, and b) some information on suppliers beyond the first tier? If yes, please provide a URL.

Related to indicator D.1.3 of the CHRB

Please use this link to [mjn.com Corporate Citizenship: Serving the Marketplace](#) for the following information:

“Our quality assurance system tracks ingredients from initial material suppliers through all processing and transport.”

*“We consistently incorporate and comply with Good Manufacturing Practices (GMPs)/Good Hygienic Practices (GHPs), Hazard Analysis Critical Control Point (HACCP) principles, **product and ingredient surveillance**, and events and issues monitoring so that every aspect of our manufacturing and distribution process delivers only the safest products to our consumers.”*

Risk assessment

8. Please describe your companies' risk assessment processes. Please include specific examples of when your company has conducted forced labor risk or impact assessments focused on a particular commodity, region or group (e.g. migrant workers in a specific context), as well as the forced labor risks identified through these risk assessment processes (e.g. high risk commodities or high risk sourcing countries).

For examples of commodities where forced labor risks have been identified - such as tomatoes from Italy, rice from India or strawberries from the United States - see Verite (2016) – [“Strengthening protections Against Trafficking in Persons in Federal and Corporate Supply Chains Research on Risk in 43 Commodities Worldwide”](#).

Related to indicator B.2.1 of the CHRB

Please use this link to [Mead Johnson Nutrition Responds to California Transparency in Supply Chains Act \(SB 657\)](#) for the following information:

“Every two years we evaluate our Suppliers against known-risk categories to assess supplier risk. Forced and child labor is included as a known-risk category in this evaluation.

MJN is also a member of Sedex (Supplier Ethical Data Exchange), a not-for-profit membership organization dedicated to driving improvements in responsible and ethical business practices in global supply chains. Sedex is currently being used by a number of retailers and brand manufacturers, and over 15,000 sites are registered on Sedex.”

Purchasing practices

Purchasing practices

9. Does your company make an effort to avoid purchasing practices that increase the risk of human trafficking and forced labor in the supply chain (e.g. short-term contracts, excessive downward pressure on pricing, sudden changes of workload?) Please elaborate.

Related to indicator D.1.2 of the CHRB

Please use this link to [Standards of Business Conduct and Ethics for Suppliers](#) for the following information:

“Regular Employment

...Likewise, Suppliers do not avoid such obligations through excessive use of fix-term contracts of employment.” (Pg 5 of 7)

“Voluntary Employment

Suppliers shall not use any form of forced, bonded, indentured or prison labor, or 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.” (Pg 4 of 7)

Supplier selection

10. Does your company assess risks of forced labor at potential suppliers prior to entering into contracts with them (this may include aspects such as passport retention and payment of wages)? Please describe.

Related to indicator B.1.7 of the CHRB

Please use this link to [Mead Johnson Nutrition Responds to California Transparency in Supply Chains Act \(SB 657\)](#) for the following information:

“Every two years we evaluate our Suppliers against known-risk categories to assess supplier risk. Forced and child labor is included as a known-risk category in this evaluation.

MJN is also a member of Sedex (Supplier Ethical Data Exchange), a not-for-profit membership organization dedicated to driving improvements in responsible and ethical business practices in global supply chains. Sedex is currently being used by a number of retailers and brand manufacturers, and over 15,000 sites are registered on Sedex.”

11. How does your company take into consideration the capacity of suppliers to meet fluctuating demands (to reduce the risk of undeclared subcontracting)?

Integration into supplier contracts

N/A

12. Does your company integrate its supply chain standards addressing forced labor and human trafficking into supplier contracts?

Related to indicator B.1.4.b of the CHRB

Yes, all MJN contracts stipulate vendors must adhere to Mead Johnson’s Standards of Business Conduct and Ethics for Supplies.

Please use this link to [Standards of Business Conduct and Ethics for Suppliers](#)

“Voluntary Employment

Suppliers shall not use any form of forced, bonded, indentured or prison labor, or 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.” (Pg 4 of 7)

Please use this link to [Mead Johnson Nutrition Responds to California Transparency in Supply Chains Act \(SB 657\)](#)

To ensure that our Suppliers comply with all laws applicable to their business and the MJN Supplier Code, we include as a standard provision in our supply agreements a warranty which stipulates that the Supplier will comply with all applicable laws and the MJN Supplier Code. The MJN Supplier Code includes a clause on Labor and Human Right which can be read by clicking the hyperlink to the MJN Supplier Code provided in the Assessment Section above.”

Cascading standards

13. Does your company have a process to cascade standards on forced labor down the supply chain (e.g. requiring first-tier suppliers to ensure that their own suppliers implement standards that are in line with the company's standards)? Please describe.

Related to indicator A.1.2 of the CHRB

Yes, this is stipulated in our [Standards of Business Conduct and Ethics for Suppliers](#):

“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.”(Pg 2 of 7)

Recruitment

Recruitment approach

14. Please describe your company's recruitment approach, including a) whether your company requires recruitment agencies in its supply chain to uphold workers' rights (this may include aspects such as written contracts, access to passports, and regular payment of wages), b) whether it has a policy on direct employment (i.e. a policy prohibiting suppliers in its supply chain from using recruitment agencies), and c) whether it requires suppliers to disclose to the company the recruiters that they use.

Related to indicator D.1.5.b of the CHRB

N/A

Recruitment fees

15. Please describe your company's approach to recruitment fees in the supply chain, including whether your company requires that no fees be charged to supply chain workers during recruitment processes, and whether and how your company ensures that fees paid by workers are reimbursed.

Related to indicator D.1.5.b of the CHRB

N/A

Recruitment audits:

16. Does your company audit recruiters used in its supply chain, to assess risks of forced labor and human trafficking, and/or require suppliers to audit their recruiters?

For further information, see Verité – [Fair Hiring Toolkit. Conducting Interviews with Labor Recruiters](#).

Both Mead Johnson Nutrition's direct and indirect sourcing agreements require compliance with our Standards of Business Conduct and Ethics for Suppliers.

*” Supplier Adherence to Applicable Law and MJN Supplier Code
To ensure that our Suppliers comply with all laws applicable to their business and the MJN Supplier Code, we include as a standard provision in our supply agreements a warranty which stipulates that the Supplier will comply with all applicable laws and the MJN Supplier Code. The MJN Supplier Code includes a clause on Labor and Human Right which can be read by clicking the hyperlink to the MJN Supplier Code provided in the Assessment Section above.” (Pg 2 of 2)*

Worker voice

Communication of policies to workers

17. Please describe how your company communicates its human trafficking and forced labor related policies and standards to workers in its supply chain, and whether your company makes its policies and standards available in the languages of suppliers' workers (including migrant workers).

Related to indicator B.1.4.b of the CHRB

Mead Johnson's Standards of Business Conduct and Ethics are available in English, Spanish, Simplified Chinese, Traditional Chinese, French, Dutch, Indonesian Bahasa, Polish, Portuguese (Brazil), Thai, Vietnamese.

Please use this link to Mead Johnson Responds to California Transparency in Supply Chain Act (SB 657) on min.com and enfamil.com

"Every two years we evaluate our Suppliers against known-risk categories to assess supplier risk. Forced and child labor is included as a known-risk category in this evaluation."

Please use this link to [Mead Johnson's Standards of Business Conduct and Ethics](#)

*"We are all expected to...Maintain a work environment that promotes respect for all employees and for the human rights of co-workers, partners, suppliers, customers, and the community."
(Pg 11 of 42)*

"Harassment

*The Company's employees and any visitors to a Mead Johnson location have the right to work in an environment that is free from intimidation, harassment and violence. Any act or threat of violence, and any verbal or physical conduct by any employee or visitor that creates an intimidating, offensive, abusive or hostile work environment, is not tolerated. In addition, unwelcome sexual advances, requests for sexual favors, and other unwelcome verbal or physical conduct of a sexual nature are strictly prohibited. Failure to follow this standard could lead to disciplinary action up to and including termination as well as criminal prosecution."
(Pg 11 of 42)*

"Working with Suppliers

*We expect our suppliers to obey the laws that require them to treat workers fairly, provide a safe and healthy work environment and protect environmental quality. Most importantly, we expect our suppliers to promote principles of ethical behavior in their workplace, to operate in a manner consistent with the Company's Supplier Code of Conduct, and to demonstrate a commitment to environmental, employment and community standards."
(Pg 37 of 42)*

Please use this link to [Standards of Business Conduct and Ethics for Suppliers](#) for the following information:

*"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."
(Pg 2 of 7)*

"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."
(Pg 4 of 7)*

"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.” (Pg 4 of 7)

Worker voice

18. Please describe how your company engages with workers in its supply chain on labor related issues and rights outside of the context of the factories/farms in which they work? (whether directly or in partnership with stakeholders).

[Example available here](#)

Related to indicator B.1.8 of the CHRB

N/A

Worker empowerment

19. Please explain how your company encourages its suppliers to ensure workplace environments where workers are able to organize, including through alternative forms of organizing, where there are regulatory constraints on freedom of association.

For additional information on worker empowerment, see context in [“Responding to Challenges of Freedom of Association” chapter of Ethical Trading Initiative’s practical guide on “Freedom of Association in Company Supply Chains”](#), and related company example on page 35

Related to indicator D.1.6.b of the CHRB

Please use this link to [Standards of Business Conduct and Ethics for Suppliers](#) for the following information:

“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.” (Pg 5 of 7)

Grievance mechanism

20. Please describe your company's grievance mechanism, and clearly indicate whether it is available to workers in the supply chain, and how it is communicated to workers in the supply chain. Please also note whether you require your suppliers to establish a grievance mechanism, and to convey the same expectation to their suppliers.

Related to indicator C.1 and C.5 of the CHRB

Please use this link to [Mead Johnson’s Standards of Business Conduct and Ethics](#) for the following information:

“Raising Concerns

We are each responsible for living our values. If you become aware of a situation that may involve a potential or actual violation of the Code of Conduct or any applicable law, policy or procedure - whether intentional or unintentional - you have a duty to report the issue promptly. Doing so will allow the Company to address the issue and resolve it, ideally before it becomes a violation of law or a risk to health, security or the Company’s reputation. Any employee or 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 Company
2701 Patriot Blvd., 4th Floor
Glenview, IL 60026
MJ Supplier Standards – Compliance” (Pg 7 of 42)

Please use this link to [Mead Johnson’s Supplier Standards](#) for the following information:

“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” (Pg 6 of 7)*

Monitoring

Auditing process

21. Please describe your company’s supplier auditing process including whether the process includes a) scheduled and non-scheduled visits, b) a review of relevant documents (documents may include wage slips, information on labor recruiters, contracts, etc.)¹, and c) interviews with workers.

For further details on document reviews see Verite – [Fair Hiring Toolkit. Conducting a Review of Documentation](#).

Related to indicator B.1.6 of the CHRB

Please use this link to [Standards of Business Conduct and Ethics for Suppliers](#) for the following information:

“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.” (Pg 6 of 7)

Please use this link to Mead Johnson Responds to California Transparency in Supply Chain Act (SB 657) on mjn.com and enfamil.com for the following information:

“MJN is also a member of Sedex (Supplier Ethical Data Exchange), a not-for-profit membership organization dedicated to driving improvements in responsible and ethical business practices in global supply chains.”

“Audits

MJN reserves the right to verify our Suppliers’ compliance with the MJN Supplier Code through a Responsible Sourcing Audit. Responsible Sourcing Audits are completed by an independent third party using the SMETA (Sedex Members Ethical Trade Audit) protocol.”

Audit disclosure

22. Does your company disclose

- a) the percentage of suppliers audited annually
- b) the percentage of unannounced audits
- c) information on who carried out the audits (this may include further information on the expertise of auditors such as relevant certifications, in cases where third-party audits are used, the names of the auditors, and in cases where internal auditors are used, details on department/team/group within which the auditor(s) sits), and
- d) a summary of findings, including details of any violations revealed?

Please provide a URL with the relevant information.

Related to indicator B.1.6 of the CHRB

Mead Johnson considers this information proprietary.

Remedy

Corrective action plans

23. Does your company have a process for creating corrective action plans when violations are discovered through an auditing process? Please describe this process and the elements of a corrective action plan.

Related to indicator B.1.6 of the CHRB

Please use this link to [Standards of Business Conduct and Ethics for Suppliers](#) or the information below:

“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.” (Pg 6 of 7)

Remedy

24. Does your company have a process to provide remedy to workers in its supply chain in cases where violations are discovered, including for responding to instances of forced labor and human trafficking? If yes, please provide examples of outcomes.

Related to indicator C.7 of the CHRB

Please use this link to [Mead Johnson Responds to California Transparency in Supply Chains Act \(SB 657\)](#) on [mjn.com](#) and [enfamil.com](#) for the information below:

“Through our Sedex membership, MJN supports mutual recognition platforms for audits to encourage our Suppliers to focus on remediation and improvements rather than re-audit by multiple customers. In the event that MJN becomes aware of any actions or conditions not in compliance with the MJN Supplier Code, MJN reserves the right to demand corrective measures. In addition, MJN reserves the right to terminate its agreement with any Supplier who does not comply with the MJN Supplier Code.”
