

Policy for Reporting Unlawful or Unethical Conduct

Adopted by the Board of Trustees, January 26, 2005



Robert Wood Johnson Foundation

The Robert Wood Johnson Foundation is committed to lawful and ethical behavior in all its activities. We require you to conduct yourself in a way that complies with all applicable laws and regulations, as well as the Foundation's ethical standards. Our policy with regard to reporting good faith concerns about the legality or propriety of Foundation actions or plans is set forth below.

Reporting Concerns. You should promptly make a report when:

- You have a good faith concern about the propriety or legality of any action that has been taken by the Foundation or another Foundation employee;
- You have a good faith concern about the propriety or legality of any action being considered by the Foundation or another Foundation employee;
- You have a good faith concern about the propriety or legality of any policy or procedure that has been adopted by, or is under consideration by, the Foundation; or
- You have a good faith belief that action needs to be taken for the Foundation to be in compliance with laws or the Foundation's ethical standards.

Reports can be made, orally or in writing, to Vice President and General Counsel or Vice President of Human Resources & Administration. Reports also may be made anonymously by calling 1-800-[xxx-xxxx].

If, after taking these steps, you believe management has been unresponsive, you should report your concerns to the chairman of the Board of Trustees' Audit Committee.

Investigation. Every report will be investigated with care and as discreetly as possible. But because of the need to investigate the report, correct a problem or prevent future problems, the Foundation cannot promise complete confidentiality.

No Retaliation. You will not be discharged, threatened or discriminated against in any manner for reporting in good faith what you perceive to be wrongdoing, violations of the law or the Foundation's ethical standards, or other unethical conduct. Any employee who threatens or retaliates against an employee who makes such a good faith report will face discipline, up to and including termination.

This non-retaliation policy applies even if your report was made in good faith but ultimately appears to be groundless, but not if you deliberately make a false report with the purpose of harming or retaliating against another employee.

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Illustrative Types of Concerns. The following is a non-exhaustive list of the types of improprieties that should be reported:

- Supplying false or misleading information on the Foundation's financial or other public documents, including its tax return (990PF);
- Embezzlement or other use of Foundation assets for personal gain or benefit;
- Payment for services or goods that are not rendered or delivered;
- Violations of the Foundation's Conflict of Interest Policy Statement;
- Violations of the Foundation's Anti-Harassment & Discrimination Policy;
- Supplying false or misleading information in connection with the Matching Gift Program; or
- Facilitating or concealing any of the above or similar actions.

The Foundation reserves the right to amend and/or supplement this policy at any time.