

Ground Rules for Live Tweeting from Company Events

- Drafts of planned tweets from live events should be reviewed and approved in advance by the Investor Relations and Legal Departments.
- Tweeting about significant pieces of information (*e.g.*, earnings guidance, dividend increase, voting outcomes) must not be tweeted until announced at the event (and in some cases until after press release has been issued).
- Someone from the Investor Relations and/or the Legal Departments should monitor all tweets from live events in real time to make sure there are no off-script tweets that could create selective disclosure (Reg. FD) issues.
- If the company will be tweeting from a live company event, that event should be webcast live and compliant with Reg. FD.
- When possible, all tweets should provide a link back to where the information can be found on the company's website and/or where someone can access the live webcast.
- Company tweets from a live event should be "book-ended" so that someone viewing the Twitter stream after the fact can clearly see where the tweets from the live event began and ended.
- Tweets with notices about forward-looking statements, or links to forward-looking statement legends, at the commencement of tweeting from live events are a good idea, but market practice is still evolving.
- Be very careful when followers ask questions about live company events via Twitter (either publicly or in a Direct Message). Resist any urge to divulge more detailed information or retweet their tweets. Do not respond to questions before consulting with the Investor Relations and Legal Departments.

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