

Global External Funding Policy

Effective: 01 October 2019

Purpose

In order for BD to achieve its purpose of *advancing the world of health*, we must do what is right. This policy provides the principles and rules for providing funding and in-kind support for charitable contributions, educational grants, commercial sponsorships to qualified organizations.

This policy complies with all applicable laws and regulations.

Scope

This policy applies to Becton, Dickinson and Company, its divisions, and majority-owned or controlled subsidiaries (“BD”).

All BD associates and agents who provide or are involved with providing external funding or in-kind (*e.g., products*) support must adhere to this policy. This includes all BD associates who provide or are involved in providing support in the form of charitable contributions, commercial sponsorships, educational grants, and research grants or investigator sponsored studies. BD sponsored educational events such as safe and effective use training or speaker events are not considered educational grants for the purposes of this policy.

If a country has laws that impose stricter standards, the stricter standards should govern activities of BD associates. Local BD policy should be developed and implemented to ensure that BD associates are familiar with the stricter standards.

Key definitions

Charitable Contributions includes both civic and healthcare contributions to a charitable organization for bona fide charitable purposes, without the expectation of receiving any tangible promotional or other benefit other than recognition of the donation. Charitable Contributions can be made to non-profit organizations recognized as charitable organizations (*e.g., 501(c)3 or equivalent*).

Commercial Sponsorship means any full or partial funding or support (*in cash or in-kind*) provided by BD for a program, event or project (*e.g., healthcare related conventions, conferences and projects supporting healthcare*) in return for advertisement or promotion of BD, BD products, medical and scientific information, including but not limited to, Commercial Sponsorships, booths, exhibit space, advertisements, memberships, signage rights, naming rights, subscriptions and/or mentioning that the program, event or project was sponsored by BD.



Contributions Committee

The Contributions Committee is responsible for establishing the overall direction of the BD charitable activities and program oversight, subject to guidelines or principles as established by the BD Board of Directors or other relevant committee.

The Contributions Committee consists of the Chief Financial Officer, or designee, and representatives from each of the Medical Affairs, Tax and Law Group (including Ethics & Compliance) functions, and may include BD business segments. The head of each named corporate function or business segment, or the Chief Executive Officer (“CEO”) if no functional head is in place, must designate a person to serve on the Contributions Committee. The Contributions Committee has the authority to nominate additional members, who must be approved by the CEO, provided that the Contributions Committee is not comprised of more than twelve (12) members. The Contributions Committee shall establish its own operating procedures and its activities shall be managed by the BD associate with managerial responsibility for the Social Investing Department (*or a successor function having the same responsibilities*). Contributions Committee members who propose, or whose operating unit or function proposes, a Charitable Contribution may not participate in either the deliberations or voting by the Contributions Committee on such proposal.

Charitable Contributions in Excess of \$50,000 (US Dollars, “USD”)

The Contributions Committee must approve Charitable Contributions that are valued in excess of \$50,000 (USD) in a fiscal year to any entity (*and its affiliates*). The Contributions Committee, CEO, and General Counsel must approve Charitable Contributions that are valued in excess of \$100,000 (USD) in any fiscal year to any entity (*and its affiliates*).

The Contributions Committee may, in its discretion, authorize in advance Charitable Contributions in the form of product donations valued in excess of \$50,000 (USD) in a fiscal year to designated organizations that are pre-qualified by the Contributions Committee.

Product donations

BD may make Charitable Contributions in the form of product donations but may only provide them for purely charitable purposes (*e.g., humanitarian or disaster relief or support of indigent care*). Product donations requested as a part of a bona fide educational program qualify as an Educational Grant as opposed to a product donation. All product donations must be reviewed and approved by the appropriate level of management, in compliance with the BD Product Donations SOP.

Donated product must be either in saleable condition or not saleable solely because of cosmetic damage.

Reporting

BD must report all Charitable Contributions in compliance with laws, regulations, and industry codes. In order to ensure all contributions are reported correctly, all BD associates must use the appropriate accounting codes when tracking all Charitable Contributions.

Approval

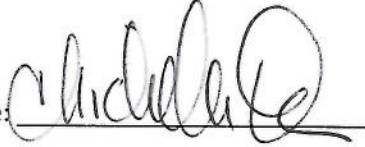
Author:

Approver:

By: Michelle T. Quinn

By: Vincent A. Forlenza

Name:



Name:



Title: *SVP, Chief Ethics & Compliance Officer,
Chief Regulatory Counsel*

Title: *Chairman & Chief Executive Officer*

