



## Norway Transparency Act Disclosure for the financial year ended 30 September 2023

**Advancing the world of health™** is BD's corporate purpose and the inspiration behind our global enterprise. It is a call to action that resounds with BD associates around the world. BD's corporate culture is guided by our Core Values:

- We do what is right;
- We thrive on innovation and demand quality;
- We are all accountable;
- We learn and improve every day;
- We help each other be great.

BD associates are expected to follow these values in all aspects of business, including dealings with suppliers, customers and other stakeholders. We see the modern social and environmental challenges our world faces as opportunities to make a difference while strengthening our company. Our approach is centered upon shared value creation, meaning how we address unmet societal needs through business models and initiatives that also contribute to the commercial success of BD.

The Norwegian Transparency Act requires Becton Dickinson Norway AS (BD Norway) to publish an annual human rights statement on the company's human rights due diligence, that includes information on the adverse impacts or significant human rights and decent working conditions risks the company has identified, measures the company has implemented or plans to implement to prevent or limit these risks, and the results or expected results of these measures. The following describes the company's effort in this regard. The company's due diligence and efforts on human rights are closely intertwined with the efforts, routines, and strategies on human rights at BD group level, and the statement will thus also account for group-level aspects.

### About BD

BD Norway is a Norwegian subsidiary of the BD group. BD is a global medical technology company that is advancing the world of health by improving medical discovery, diagnostics and the delivery of care. This statement covers BD's programs and activities for our fiscal year ending on September 30, 2023 ("FY'2023"). In FY'2023, BD operated three worldwide segments: BD Medical, which included Medication Management Solutions, Medication and Procedural Solutions, and Pharmaceutical Systems; BD Life Sciences, which included Biosciences and Integrated Diagnostic Solutions; and BD Interventional, which included Surgery, Peripheral Intervention and Urology and Critical Care.

In FY'2023, our operations spanned over 297 locations worldwide comprising of manufacturing, warehousing, administrative and research facilities. We were comprised of over 73,000 associates serving over 62 countries making BD a truly global organization. In FY'2023, BD worked with approximately 39,000 suppliers globally that provide both goods and services. BD has over 1,100 core suppliers that provide key materials, including plastics, glass, metals, textiles, electronic and mechanical subassemblies, and various paper, agricultural, biological, chemical and petrochemical products.

BD is headquartered in Franklin Lakes, NJ (USA) and is publicly listed. Main operations include the manufacturing and supply of medical technology.

### BD Norway specific description, structure, operations



Per January 2024 BD Norway has 30 employees. Roles include sales, clinical and application specialist, field service engineer, medical affairs, pricing & tender specialist, technical sales representative, business development, etc. BD Norway's main office is located in Oslo. It also has a small office in Trondheim.

### **Governance**

Human Rights management is embedded in our Integrated Supply Chain (including Operations, Supply Chain, Procurement and Sustainability & EHS) and human resources functions, to foster compliance with our policies prohibiting forced labor, human trafficking and modern slavery across all of our operations. The central S&EHS team is responsible for monitoring and coordinating efforts to provide awareness of human rights compliance obligations. Our Responsible Sourcing team, located within our Procurement team, is responsible for developing and deploying our Human Rights Due Diligence efforts within our Supply Chain – a process which is overseen by the Responsible Sourcing Operating Committee which ultimately reports into our Chief Sustainability Officer and SVP, Global Supply Chain and Chief Procurement Officer. As important matters relating to human rights issues arise, the VP S&EHS will brief the Enterprise Risk and ESG Committee (ERC) as needed; the ERC will brief the relevant Board committee and the full Board if applicable.

As BD is a global entity, we primarily address Human Rights Due Diligence from a global perspective. With nearly 40,000 suppliers spread across the world, we have established our governance to account for the wide-reaching scope of our supply base. For this reason, our governance efforts, and the rest of our human rights' due diligence structures, are administered on a corporate level. From a regional or country perspective, we coordinate with local leaders with responsibility for human rights as needed; when a risk is identified, when deeper assessment is needed, when corrective actions must be put in place, etc. For BD Norway we have administered a geography specific risk assessment for suppliers to BD Norway, detailed further below.

BD Norway programs in place to monitor and advance human efforts include:

- The recently updated job description of the Country General Manager Nordics now explicitly includes the responsibility for compliance with BD' policy commitment, specifically regarding human rights, labor rights, environmental protection, and anti-corruption. BD Norway supplier risk assessment - geography specific human rights risk assessment
- Member of Melanor, the Norwegian local MedTech association
- Quality Management System that includes supplier assessment
- Good Jobs Strategy Country Specific Actions
- D&E council: International Women's Day event, Pride month event, Learning week with focus on wellbeing, event focusing on different cultures and cultural appreciation. HR: Manager sessions to support managers, wellbeing events, team meetings for all BUs, kick-off event, employee fund that arranges summer party, Christmas dinner.

### **Measures to limit adverse impacts**

#### *Policies*

BD is committed to acting in compliance with all applicable laws and BD's ethical standards and ensuring that no instances of modern slavery or human trafficking occur in any part of our own businesses or our



supply chain. To that end, BD maintains several policies that reflect our Core Values, which BD associates are expected to follow in all aspects of business, including dealings with suppliers, customers and other stakeholders. These include:

- The [BD Code of Conduct](#) - including our policies on human rights and prohibits the use of forced, prison, indentured, bonded or involuntary labor in all of BD's operations. BD is committed to conducting business in a manner that is compliant with all applicable laws, including employment and human rights laws and regulations wherever we have operations.
- The [BD Global Human Rights Policy](#) - which outlines our policy on human rights in more detail.
- The [Expectations for Suppliers](#) which prohibit the use of involuntary labor of any kind, including slave labor, indentured/debt labor, forced labor, or prison labor or human rights abuses of any kind by BD suppliers. This document is updated on a bi-annual basis to account for changing practices.
- The [BD Global Speak Up Policy](#) - encourages and expects all associates and agents to speak up about any actual or suspected violations of laws, regulations, the BD Code of Conduct, BD Policies, or relevant industry codes, except as prohibited by law, as per its Global Speaking Up Policy. Those that speak up in good faith are protected against any form of retaliation or discipline.

#### *Implementation*

The human rights commitments in the BD Human Rights Policy and the BD Code of Conduct are integrated across our operations through a number of oversight systems and processes.

Our Integrated Supply Chain (including Operations, Supply Chain, Procurement and Sustainability/EHS) and Human Resources functions ensure compliance with our policies prohibiting forced labor, human trafficking and modern slavery across all of our operations.

Implemented policies geared toward ensuring that modern slavery do not exist in the BD workforce and across all our sites, operations, and subsidiaries (including BD Norway) include:

- We do not charge any of our associates recruitment fees and do not work with recruitment agencies that engage in this practice.
- We do not withhold identity documents, immigration documents or any other personal documentation of our associates.
- We encourage our associates to report, without fear of retaliation, any matters related to human trafficking, modern slavery, or any other human rights violations.
- We follow an established vetting process for new recruitment agencies prior to use.

At the manufacturing and distribution level, our Global Operations teams ensure continued compliance through several layers of risk management, such as regular internal audits that include desk-based and on-the-ground EHS audits.

In early FY2023, we began work on a human rights salience assessment across our entire value chain to identify and prioritize human rights risks relevant to BD aligned with the United Nations Guiding Principles Reporting Framework criteria regarding scale, scope, remedability and likelihood.



Our 2030+ ESG goal for a healthy workforce and communities, and programs such as our Good Jobs Strategy support decent work and economic growth. The Good Jobs Strategy provides a framework to offer attractive careers for our manufacturing associates by fostering a safe work environment, providing job satisfaction and a sense of belonging, and offering competitive healthcare and compensation, as well as training and development opportunities.

All of our manufacturing and distribution locations complete an annual self-assessment and develop action plans for specific site improvements. Actions include additional training for leaders, enhanced communication mechanisms and career path programs. This year, the assessment tool was refreshed to better align with the organization's priorities regarding safety, BD Excellence and Inclusion, Diversity & Equity, and places additional focus on leading indicators. There has been strong progress on improving human rights topics such as fair wages and benefits, workplace safety and working conditions.

With a global supply chain of over 39,000 tier 1 suppliers, the sheer size and scope of our supply chain presents a risk that we may not be able to discover high risk suppliers for further evaluation through existing due diligence processes. This is because of the vast number of suppliers to assess. We also recognize that a supply chain of this size increases the number of sub-tier suppliers in our network, thus increasing the chance of instances of modern slavery in our extended supply base. We mitigate these risks through due diligence processes that focus on prioritizing high-risk factors, such as a supplier's manufacturing location, both for existing suppliers and, as we update our pre-screening process, for new suppliers.

Suppliers are analyzed, via a third party, against geographic or location risk<sup>a</sup> and geopolitical risk as it relates to modern slavery and other human rights risks, and a third-party news monitoring system is in place to flag any issues as they arise. Suppliers that are deemed as highest risk and/or key BD suppliers are prioritized for detailed assessment via a third-party administered desktop audit, review by Responsible Sourcing Operating Committee, and/or full in-person audits, depending on the level of risk identified.

Additionally, BD employees are trained to report concerns around Code of Conduct violations to the BD Ethics Hotline. BD suppliers are also encouraged to report concerns through the same process (see BD's Expectations for Suppliers). Such reports may trigger additional risk assessments involving the Ethics Office, Global Operations, Responsible Sourcing Operating Committee, and any other relevant departments, until identified risks are adequately managed, by appropriate follow-up actions where necessary.

For BD Norway, the scale and scope of the supply chain is much smaller. BD Norway does not manufacture directly and therefore has a much smaller, lower risk supply chain. Our initial risk assessment of the BD Norway supplier list indicates that this list has an average score of 'low' with each unique supplier representing low risk. BD Norway suppliers are assessed as part of our BD Global human rights due diligence efforts. The vast majority of BD Norway suppliers are regional; sourcing comes mainly from Norway, Denmark or Sweden.

Even though our initial risk assessment for BD Norway represents low risk overall, we did prioritize some suppliers to BD Norway for the next phase in our due diligence process; ESG desktop audit. The results of these audits for suppliers to BD Norway did not result in any high risk for human rights abuses, and no corrective actions were required. The key risk that BD Norway faces in terms of human rights is that of



our wider, BD corporate, supply chain – which is covered by our global approach to human rights due diligence, outlined above.

Finally, BD's Expectations for Suppliers (EFS) was first published in 2009 and since that time BD has worked to communicate the EFS to suppliers and confirm their compliance. This document details the minimum standards that all our suppliers must meet with regards to human rights, among other topics. Compliance has been evaluated primarily through written acknowledgements and through periodic audits based on the level of risk. BD includes language that requires its suppliers represent, warrant, and/or certify to comply with the EFS and all relevant laws (including labor laws) in our contracts, purchase orders and supplier terms and conditions, among others, where failure to comply could be a breach of contract and result in contract termination, payment of damages and other consequences and/or remedies depending on the terms of the agreement. This document is updated biannually and suppliers are trained on it after each update.

#### *Training and Capacity Building*

BD takes steps to educate associates and third parties so they can identify modern slavery and other human rights abuses and take steps to eliminate them – both in our own operations and within our supply chain. These steps include:

- For our own operations, including our manufacturing sites, BD maintains robust Environmental, Health, and Safety, Ethics and Compliance, and Labor Standards programs that foster a culture of compliance within both the BD Code of Conduct and local laws, whichever are more robust. These programs include relevant trainings and guidance as appropriate. Additionally, all BD associates are trained annually on our BD Code of Conduct, which includes a section on Human Rights and links to relevant policies such as BD Human Rights Policy.
- BD provides a Modern Slavery and Human Trafficking training developed by a third party and administered online, annually. This course explains that forced labor, also known as modern slavery, still exists in the world and prompts the learner to consider ways of identifying, preventing and stopping it in the supply chain. It also trains BD associates on how to report known or suspected human rights abuses via our Ethics Helpline. This course is delivered to BD associates that interact directly and indirectly in sourcing, managing, advising on, or are otherwise involved with our suppliers, including but not limited to our leaders and our associates in the following departments: Environment, Health and Safety, Procurement, Supply Chain, Quality, R&D, Operations, Human Resources, and our Law Group.
- BD provides both internal and external trainings on the Expectations for Suppliers document.
  - Internally, all procurement functions attended a required training around the Expectations for Suppliers. This training detailed updates made to the document, implementation of the document, how BD implements the expectations laid out in the document, and how to report suspected non-compliance. This training was administered to Procurement associates as part of a larger Responsible Sourcing Training effort around topics like human rights.
  - For Suppliers, BD administers an online training on our Expectations for Suppliers to all suppliers. These trainings include background on human rights risks, minimum standards suppliers must meet, and resources for suppliers to learn more. This training also includes an overview of any updates made to the Expectations for Suppliers in the latest version.

#### *Due Diligence*



Our human rights due diligence is based on the principles outlined in the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises.

For our own operations, including our manufacturing sites, BD maintains robust Environmental, Health, and Safety (EHS) and Ethics & Compliance programs that foster a culture of compliance with the BD Code of Conduct and local laws, whichever are more stringent. Newly acquired operations are included to ensure that they meet BD expectations and policy requirements.

Within our supply chain, where our highest risk of slavery and human trafficking exists, suppliers are evaluated by a third party to understand Human Rights risk, which includes Modern Slavery risk factors. BD recognizes that our highest risk suppliers are likely to be found in countries and industries cited for having the highest prevalence of modern slavery and human trafficking rights violations.

BD then prioritizes suppliers globally across all BD subsidiaries and BUs for the next level of assessment (via a third-party administered desktop assessment) based on this risk, criticality of the supplier to BD, and our internal dynamic model. The BD supplier risk assessment, which applies to all BD subsidiaries alike, including BD Norway, focusses on products sold by all subsidiaries rather than BD subsidiaries' specific suppliers. Our supplier risk assessment is ever-evolving as we monitor emerging and ongoing risks and is guided by third party risk intelligence solutions. Results of this desktop assessment may end in review by Responsible Sourcing Operating Committee, and/or full in-person audits, depending on the level of risk identified.

These desktop audits address ESG topics with BD focus on results of Labor and Human Rights assessment area. As part of the assessment, suppliers are asked to show documentation that these practices are put in place effectively. A third-party expert reviews this documentation to ensure a non-biased evaluation. As suppliers are identified as high risk our Responsible Sourcing Operating Committee, consisting of multifunctional representatives tasked with oversight of the BD Human Rights Due Diligence efforts (Reporting into the Chief Sustainability Officer and Chief Procurement Officer), works to engage across the company to support the review and remediation of risks or known issues identified within the supplier. If a supplier receives an unacceptable score on their desktop audit BD immediately assigns corrective actions in the tool to improve their score and will evaluate results through this Responsible Sourcing Operating committee to determine the best path for further engagement; this may include the further assignment and review of corrective actions (both in and outside the tool), in-person human rights focused audits, or remediation as necessary.

BD started our initial desktop audits in FY'2020 and has continued to roll these audits to key and/or high-risk suppliers.

Additionally, in partnership with our risk monitoring supplier, using AI and machine learning, we've been mapping our sub-tier supply chains for critical to health product lines. This solution allows us to better understand tier-n risk for specific risk areas; particularly useful for our understanding of BD supply chain's human rights risk where specific regions and commodities are designated as known issues. By using this mapping capability, BD has focused on mapping specific complex issues, rather than attempting to map a network of this size and scope in its entirety, thus allowing us to focus on areas of our greatest risk. This cutting-edge capability allows BD to more confidently understand our risk profile, and thus target human rights risks directly.



BD deploys this mapping technology as key human rights risks emerge, such as elevated risk for specific commodities coming from specific regions. BD does not report this risk analysis publicly but does communicate through our upstream supplier network to strengthen our understanding of the risk and account for it as necessary.

In addition to our human rights' due diligence activities, BD performs announced on-site audits of our suppliers which focus on supplier quality. If the auditor identifies any potential concerns outside the planned scope of the audit (such as safety and human rights concerns), the auditor is asked to report it via our internal grievance mechanism as soon as possible with any relevant information. All BD associates performing these audits are trained in identifying human rights violations and are expected to report any instances, if found (details in the Reporting/Grievance Mechanism section, below).

### Results of Due Diligence

Based on the BD Human Rights Due Diligence process, BD Norway suppliers represent an extremely low risk for human rights abuses. The key risk to BD Norway is the risk that BD faces globally in the size of our supply chain.

BD has globally assessed 1,150 suppliers through desktop assessments and mapped up to tier 5 of our supply chain for specific risks. Through this process we have identified several risks to our supply chain. The greatest risk we face is that of modern slavery, particularly regional modern slavery found past tier 1 in our supply chain. For this reason, we will focus further on our tier-n mapping efforts to build our upstream supplier network of human rights due diligence in the coming years.

### *Reporting/Grievance Mechanism*

BD maintains the BD Ethics Hotline, a third-party led monitoring and oversight mechanism that is available both internally for BD associates and externally for all stakeholders. This system allows for anonymous (where permitted by law) and/or confidential reporting of all matters of ethics concerns, including known or suspected human rights abuses, both within BD and in our wider supply chain. [It is available online](#) or via telephone in a number of languages (detailed in the BD Expectations for Suppliers).

### **Results**

Across all of our programs that address Human Rights and Modern Slavery, we assess management effectiveness through periodic program reviews and have started to implement KPIs to track this work.

In FY'2021 we established KPIs that include:

1. We will strengthen engagement with supply chain partners on their labor and environmental practices and performance by completing desktop environmental/social audits for strategic, preferred and critical suppliers by 2023.
2. We will partner with strategic/preferred/critical suppliers to evaluate risk in Tier-2 by 2030.
3. We will seek to have 90% of total spend reflected in completed supplier ESG focused desktop audit by 2025.

As of the end of FY'2023, we have completed a total of 1150 supplier audits. To date, this represents 68 percent of our total spend having completed a supplier scorecard.

We also report progress against these goals in our annual ESG Report, available at [bd.com](#).



During the development of this statement, we engaged with each of the reporting entities covered by this statement and consulted with the entities we own or control. We discussed details of the reporting requirements and information regarding the actions we intend to take to address these requirements and provided them with relevant materials and updates.

This statement was approved and adopted by the BD Board of Directors for Becton Dickinson Norway A/S on 23 February 2024.

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