

## CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT DISCLOSURE

**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 California Transparency in Supply Chains Act requires BD to disclose the extent of our anti-trafficking and anti-slavery human rights efforts in our direct product supply chain in five areas: verification, audits, certification, internal accountability, and training. The following describes BD's effort in this regard.

### 1. Verification

BD is committed to working with suppliers who can demonstrate their efforts to eradicating slavery and human trafficking. Our Expectations for Suppliers (EFS) document details the minimum standards that all our suppliers must meet with regards to human rights. More detail on this document is provided in the Certification section, below. We take steps to verify, both internally and via third party vendors compliance to the EFS throughout our supply chain.

During supplier qualification, new suppliers are assessed for Ethics and Compliance via a third party – which includes any reputational risks.

On an ongoing basis, BD suppliers are analyzed annually, via a third party, against two focus areas; industry specific risk and geographic or location risk<sup>1</sup>. BD recognizes that our highest risk suppliers are likely to be found in countries cited for having the highest prevalence of modern slavery and human trafficking rights violations. Suppliers with the highest risk profiles are prioritized for further evaluation (see more information in the Audit section, below).

BD is also engaged in a long-term end-to-end mapping of our supply chain. The first priority in this mapping is on our critical Tier 1 suppliers. This helps us to better understand the wider set of potential risks across our supply chain and appropriately respond to these risks in order to remediate them.

### 2. Audits

Within our supply chain, suppliers identified as high priority (via the process outlined in the Verification section, above) will be asked to complete an in-depth third-party-led desktop audit, the results of which may trigger site inspections and/or in-person audits or guide BD's remediation efforts if deemed

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<sup>1</sup> Risk, in this case, is specific to human rights risk.

necessary. As part of our continuous improvement plans, we aim for all BD suppliers to complete a desktop audit over the long term. Suppliers who have completed an audit will be asked to update it each year. These desktop audits are not unannounced. BD maintains the right to conduct site inspections and audits of suppliers, by itself or through a third party.

In addition to our human rights due diligence activities, BD performs announced on-site audits of our suppliers which focus on supplier quality. These are performed by both BD associates and third parties. 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 Internal Accountability and Training sections, below).

### 3. Certification

[BD's Expectations for Suppliers](#) was first published in 2009 and details social, environmental and governance standards which we expect our suppliers to uphold. These standards prohibit the use of involuntary labor of any kind, including slave labor, indentured/debt labor, forced labor, human trafficking, or prison labor. Since publishing this document, BD has worked to communicate the EFS with suppliers and confirm their compliance. Compliance has been evaluated primarily through written acknowledgements as updates to the document are published and through periodic third party led desktop audits based on a high 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.

### 4. Internal Accountability

BD is committed to ensuring our associates and contractors act in material compliance with all applicable laws and BD's high ethical standards and ensure that no instances of slavery or human trafficking occur in any part of our own businesses or our supply chain. To that end, BD provides trainings to our associates via an online training portal. Trainings are assigned regularly to associates to ensure they are equipped with the knowledge and tools to perform their duties in a way that complies with all applicable laws and aligns with BD policies. Trainings include identification of modern slavery and human trafficking, how to report suspected human rights violations, code of conduct training, and various trainings on specific regulatory issues geared to specific job roles. More information on this training is detailed in the Training section of this document.

BD maintains several policies that reflect our Core Values. Noncompliance by our associates with these policies may result in corrective action or termination, overseen by the Ethics and Compliance office. These policies include:

- The BD Human Rights Policy, that prohibits the use of forced, prison, indentured, bonded or involuntary labor in all of BD 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 commitments in the Human Rights Policy are integrated across our operations through a number of oversight systems and processes. Our Integrated Supply Chain, Ethics and Compliance, and Human Resources functions ensure compliance with our policies prohibiting forced labor, human trafficking and modern slavery across all of our operations. At the

manufacturing level, our Global Manufacturing teams ensure continued compliance through several layers of risk management such as regular internal audits that include desk-based and on-the-ground Environmental, Health, and Safety audits.

- [The BD Code of Conduct](#) that reaffirms the Human Rights commitments outlined in the above policy. This document outlines a number of standards which associates must abide by. It also highlights the Global Speaking Up Policy (detailed below) and how to report violations and grievances (see Ethics Hotline below) without fear of retaliation or discipline.
- BD maintains the BD Ethics Helpline, 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 matter 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.
- BD Global Speaking Up Policy, which 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. Those that speak up in good faith are protected against any form of retaliation or discipline.

## 5. Training

BD takes steps to educate associates 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, BD Human Rights Policy and all other BD Policies.
- 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.