

BD Supplier RoHS Guidance

This document contains guidance on how to access and complete the BD questionnaires as well as providing information on regulations and requirements.

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BD Supply Base Compliance

E-mail: rohs@bd.com

<http://www.bd.com/sustainability/>

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1. RoHS INTRODUCTION

BD is committed to taking the steps necessary to comply with RoHS Directive 2011/65/EU and has implemented processes to meet the Directive's requirements. BD expects its suppliers and subcontractors to consider the environment when sourcing.

In furtherance of this expectation and BD's obligations under RoHS 2, applicable BD suppliers and subcontractors (as defined by BD's Supply Base Compliance group) will be expected to complete a questionnaire concerning the usage of any hazardous substances in the products supplied to us. As part of gathering the information for the questionnaire, applicable BD suppliers and subcontractors will be expected to provide full material disclosures, supplier declarations, or analytical test results.

BD has put in place processes and procedures to help ensure that we receive environmentally compliant materials from our suppliers and subcontractors, including the following:

1. Require applicable suppliers and subcontractors to provide objective evidence of regulated material environmental compliance.
2. Assure through internal evaluation that new materials being considered for potential integration into existing or new BD products do not contain restricted hazardous substances. (See RoHS Restricted Substances List section below for more details.)
3. Communicate to applicable suppliers and subcontractors our expectation that they:
 - a) adopt policies on RoHS that are consistent with BD's RoHS policy;
 - b) establish due diligence frameworks and management systems that are consistent with the RoHS Guidance; and communicate an expectation to their direct and indirect suppliers that they do the same.



In cases where suppliers or subcontractors are found to not be in compliance with our RoHS requirements, we intend to work with them. Where these efforts fail or we believe that further engagement with a supplier or subcontractor is inappropriate, we will re-evaluate our business relationship.

To learn more about BD's Sustainability policy, please review our Sustainability Report at www.bd.com/sustainability/. Any questions concerning this Supplier Guidance should be directed to RoHS@bd.com.

1.1 RoHS Restricted Substances List

The RoHS restricted substances apply to all parts in electrical and electronic equipment. RoHS specifies the following maximum concentration values tolerated by weight in homogenous materials*:

- Lead (Pb) - 0.1%
- Mercury (Hg) - 0.1%
- Cadmium (Cd) - 0.01%
- Hexavalent chromium (Cr^{6+}) - 0.1%, used in chrome plating, chromate coatings and primers, and in chromic acid
- Polybrominated biphenyls (PBB) - 0.1%, flame retardants used in several plastics
- Polybrominated diphenyl ether (PBDE) - 0.1% flame retardants used in several plastics

Note that these are only representative uses of RoHS materials. They are used in many other products as well.

*"Homogeneous material" means one material of uniform composition throughout or a material consisting of a combination of materials, that cannot be disjointed or separated into different



materials by mechanical actions such as unscrewing, cutting, crushing, grinding and abrasive processes.

1.2 Regulatory background

The original RoHS Directive was the Restriction of the use of certain Hazardous Substances in electrical and electronic equipment (EEE) - Directive 2002/95/EC. RoHS was recast as Directive 2011/65/EU to include medical devices and monitoring and control instruments and clarify and harmonize the original directive.

1.3 Regulation Specifics

The regulation generally requires, among other things, that companies wishing to sell their products within the EU and affix a CE mark:

- Assess their supply base for risk of RoHS compliance violations
- Collect objective evidence of hazardous substances absence from their products (or presence with exemptions)

The RoHS directive 2011/65/EU applies to all parts within electrical and electronic medical devices or monitoring and control instruments.

The information contained herein is only a brief summary of portions of the RoHS Directive. Suppliers are expected to familiarize themselves with the RoHS directive to the extent necessary to meet their reporting requirements to BD.



1.4 Reporting and Inquiry Requirements

The following documents are acceptable forms of documentation for RoHS compliance (objective evidence):

- a) Supplier Declaration
- b) Contractual Agreement
- c) Full Material Disclosure
- d) Analytical Test Results - Must be performed by an accredited lab, dated, include results for all relevant homogenous materials, show results, and/or explicitly list exemptions
- e) Website Declarations - Must include signature, identification of any exemptions, material weight
- f) IPC 1752-2 formats Classes 1-6

Documentation must include:

- a. Vendor NAME
- b. Signature of a responsible party
- c. Current RoHS Version: 2011/65/EU, 6 RoHS Substances
- d. EXEMPTIONS must be explicitly stated along with expiration dates and actual values present
- e. NO ambiguous statements or DISCLAIMERS
- f. Identity of material in a way that is easily traceable to BD PART NUMBERS

In addition, if the item that BD purchases is an assembly, the certificate should cover the entire assembly.

In other words, the documentation should include:



- Statement that proof of compliance is available for EVERY material, component, or part which make up the assembly.
- RoHS Certification of manufacturing/assembly PROCESS.

1.5 Steps to Provide Information to BD

To enable BD to meet its requirements under the RoHS Directive, suppliers will receive surveys requiring them to provide information on substances present in their parts, as well as other related information. This procedure will occur when BD first creates a technical file for a product or when sourcing changes have been made. Suppliers will be able to submit information into the survey via the online Material Disclosure Supplier Portal.

2. MATERIAL DISCLOSURE TOOL- GUIDANCE FOR SUPPLIERS

Material Disclosure is a web application that is used for data collection. It is also a communication tool between BD and its suppliers. Communication with suppliers is initiated by the BD RoHS Team sending an e-mail with a link to the Material Disclosure Supplier Portal. The supplier will use the link to access the BD questionnaire. Further communication between BD and suppliers can be conducted using the following e-mail address: RoHS@bd.com.

2.1 Login to the Portal for the First Time

2.1.1 Receiving the E-mail

As a BD supplier you shall receive an e-mail from RoHS@bd.com that will contain:

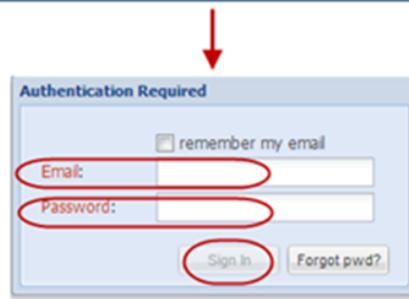
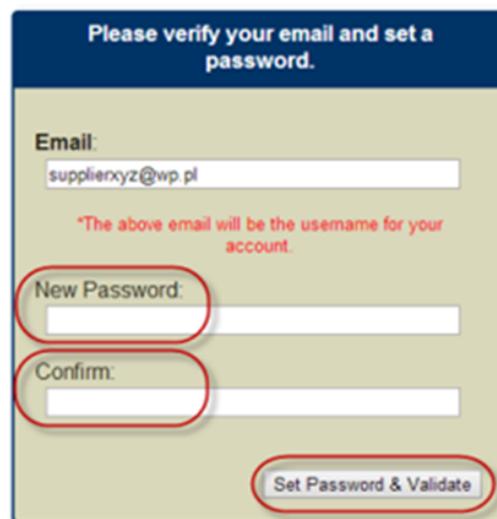
- A link to the Material Disclosure Supplier Portal,
- A questionnaire.

2.1.2 First Time Log-in

Step 1: Within the e-mail message you will see Supplier Name (your company or its subsidiaries). **To enter the supplier portal** click on ‘click here’ contained in the e-mail message.

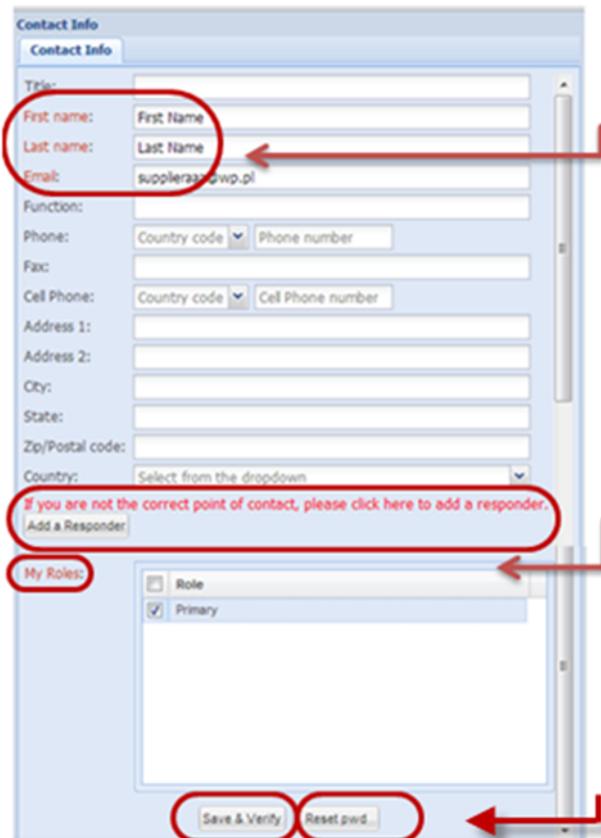
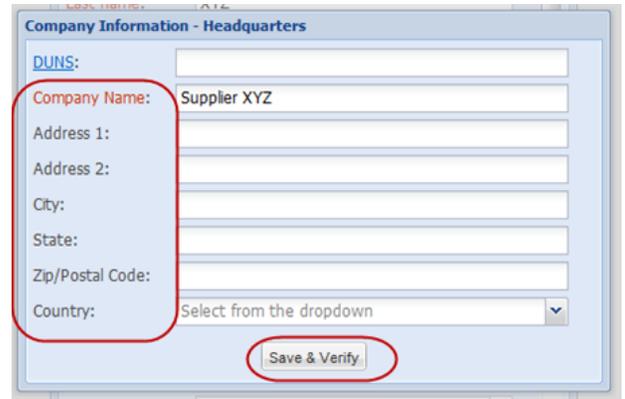
Step 2: You will be asked to **verify your email address and set a password**. Please type a Password and confirm it. Click ‘Set Password & Validate’ button.

NOTE: All fields in red are mandatory to fill in.



Step 3: You will be directed to the Material Disclosure **login page** where you will be asked to enter your email address and newly set password. Click ‘Sign In’ button.

Step 4: Since this is the first login, you will be asked to **verify your company information** by providing details such as: Company Name, Address, etc. Once you have it completed, click ‘Save & Verify’ button.



Step 5: You will then be asked to verify your contact info by filling in fields as shown on the screen below. Please make sure that all headers marked in a red color are completed as these are mandatory fields. You will be also asked to choose a role for a contact.

NOTE: If you are **not the correct point of contact** within your organization or if you want to **add another contact**, please provide appropriate contact details by clicking ‘Add a responder’ (see below how to complete this).

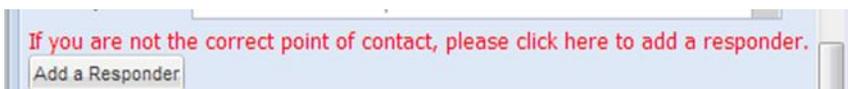
In order to **reset your password** - click ‘Reset pwd’ button and a link will be sent to your email address. It expires within 2 hours. Once you have completed all of the information, click the ‘Save & Verify’ button.



2.2 Adding a Responder

If you are not the correct point of contact, please provide (or confirm) contact details of the person/group within your organization who should receive the questionnaire.

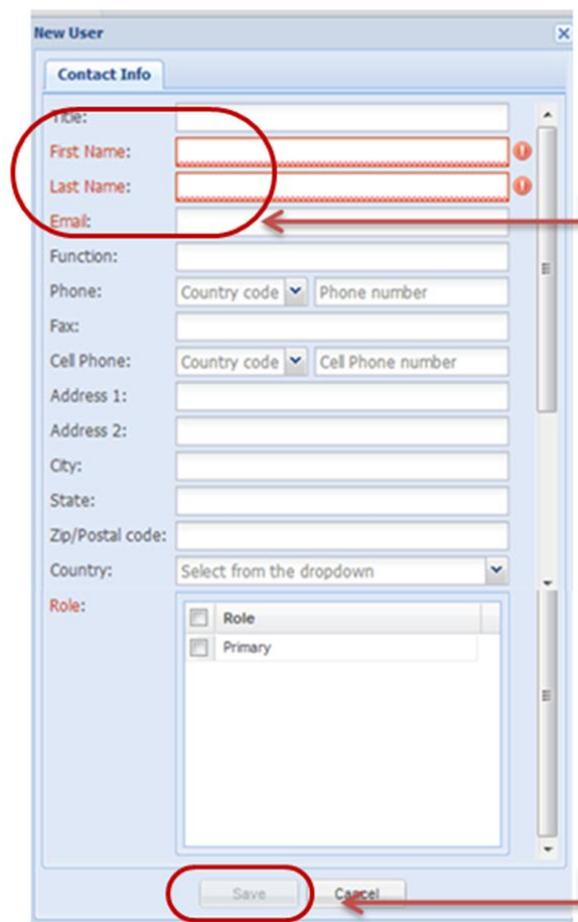
Step 1: Click 'Add a Responder' button.



Step 2: You will see all of the contact email addresses assigned to your company. To **add a new contact**, click the 'Add' button.



Step 3: Provide first and last name, email address and the role of the new contact - these fields are mandatory. You can also provide information such as: address, phone, country etc.



Step 4: Once you have completed the required information, click 'Save'.

Step 5: By clicking on the 'Notify' button the campaign **questionnaire will be forwarded** to the new contact person and he or she will be able to log into portal.

	First Name	Last Name	Email	Role
<input checked="" type="checkbox"/>	First Name	Last Name	email@email.com	Primary
<input type="checkbox"/>	First Name	Last Name	supplieraaa@wp.pl	Primary

Company Name	Verified	Country	Can login
Supplier ABC	Aug 5, 2013		✓
Supplier XYZ	Aug 5, 2013		✓

Step 6: If you are the contact person for multiple accounts (Company Names), choose one of the Company Name(s) listed and you will be able to access all questionnaires assigned to you.

2.3 Subsequent Logins

Please verify your email and set a password.

Email:
supplierxyz@wp.pl

*The above email will be the username for your account.

New Password:
[input field]

Confirm:
[input field]

[I know my password. Take me to the login page.](#)

Set Password & Validate

Step 1: By clicking the link found in the email it will take you to the Material Disclosure Supplier Portal.

You will be asked to **verify your email and set a password.**

If you remember the previously set password click ‘I know my password. Take me to the login page’ button.

If you have **forgotten your password** you can reset it by providing a new one and confirming it.

Step 2: You will be taken to the login page. Insert your email address and password and click ‘Sign In’.

ACTIO Material Disclosure - Supplier Portal

Authentication Required

remember my email

Email: [input field]

Password: [input field]

Sign In Forgot pwd?



Step 3: Once you are signed in to the Supplier Portal you will see a list of pending questionnaires. The color of the flag on the left reflects your questionnaire status:

-  The questionnaire for this Campaign has been completed and submitted.
-  The questionnaire for this Campaign is currently in process and has not yet been completed and submitted.
-  The questionnaire for this campaign has not been completed or submitted.

My Requests

**Instructions: Please double click each record in the table below to answer the questionnaire. Thank you.*

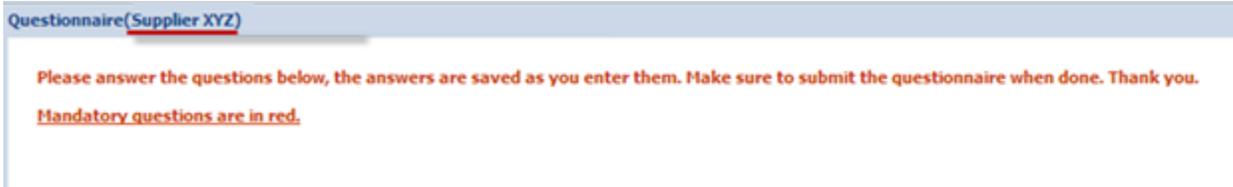
Status	Requested On	Completed On	Name	Description	Questionnaire Name	Campaign Type	Supplier Name	Customer
	29 Apr 2014		Item 1	12345	test1234	Item	Supplier XYZ	BD TEST
	29 Apr 2014	29 Apr 2014	Item 2	2345	test1234	Item	Supplier XYZ	BD TEST
	29 Apr 2014		Item 3	3456	test1234	Item	Supplier XYZ	BD TEST

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2.4 Entering the Questionnaire

Choose the questionnaire you would like to open and double click on it. Once you have opened the relevant questionnaire you will see the supplier name on the top left hand side of the window.



2.5 Completing the Questionnaire

Please review the questionnaire, read the instructions and answer the questions. If you have any queries please refer to this Guidance document or contact us at: RoHS@bd.com for further assistance.

Important Points to Remember:

- All questions in red are mandatory and it is not possible to submit the questionnaire unless these questions are completed.
- Be aware that some questions are triggered by answers provided in the previous question.

2.6 Questionnaire Options

At the bottom of the questionnaire window there are five (5) buttons:



By clicking them you are able to:

2.6.1 Refresh



Refresh the site.

2.6.2 Save



To save the answers provided in the questionnaire click the 'Save' button. Next time you enter the questionnaire you will be able to view your answers and edit them if needed before submitting to BD.

If you click the 'Save' button, the status of the questionnaire changes from red color: 'No response yet for campaign questionnaire' to yellow color: 'Campaign questionnaire in process, not completed yet.'

Note: Once you save the questionnaire your answers will be visible to BD.

2.6.3 Submit to Becton Dickinson



When you are ready to submit the questionnaire to BD click the 'Submit to Becton Dickinson' button. Be aware that once you submit it, you are not able to change the questionnaire. The status of the campaign will change to: 'Campaign Questionnaire Complete' and the flag color will be green.

When you log in again to the portal you will see the submitted questionnaire(s) with the most current answers in PDF format. You can view the questionnaire(s) for up to 60 days. At that point the document(s) will be removed from the portal.

2.6.4 Show as PDF



You can create a PDF document by clicking 'Show as PDF'. You can also print a copy of the questionnaire if required.

2.6.5 Add a Responder



If you are **not the right person** in your company to respond to questions regarding RoHS compliance, you can **forward the questionnaire to another person** within your organization. (*Described in section Adding a Responder*)

2.6.6 Subsequent Questionnaires

New questionnaires will be sent to you by email as regulatory and BD requirements are updated. Once you have logged into the Supplier Portal, you will see the list of the questionnaires we have sent to you in the last 60 days.

Please note that **new questionnaires** will be **pre-populated with answers** you provided in previously submitted questionnaires. You are able to update these responses before submitting the questionnaire to BD.



3. FAQ – FREQUENTLY ASKED QUESTIONS

Q: What happens if I do not respond to the questionnaire?

A: Lack of response within the given time will result in escalation to BD Global Procurement and if a satisfactory response is not provided, BD may be forced to seek an alternative supplier. Please contact the BD RoHS Team (RoHS@bd.com) to discuss or obtain further guidance.

Q: I am not the correct person to be contacted for RoHS compliance issues. How can I indicate the correct contact in my company?

A: There are several ways to indicate if another person should be contacted or forward the e-mail/questionnaire to this person:

- 1) When you receive the first email with the link to the portal and are asked to verify your company details. Click ‘Add a responder’ so that a new contact will be created for your company and the questionnaire forwarded.
- 2) When you enter a questionnaire - on the bottom of the window you will see a button ‘Add a responder’.

NOTE: Do not forward the email to another person as this action does not create a new account for them.

Q: Why am I being asked about regulations which I am not legally obliged to comply with?

A: The RoHS Directive requires BD to obtain information from its supply chain, irrespective of whether a supplier is a provider of electronic components or not.

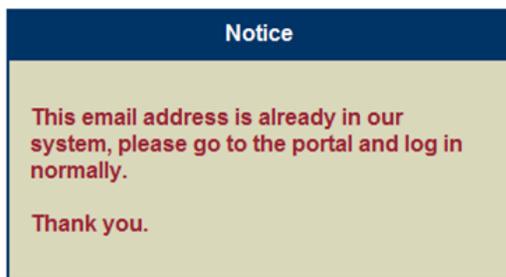
Q: I have already answered a questionnaire. Why am I being asked again?

A: The RoHS Directive requires companies trading in the European Union to keep the technical files associated with CE marking up to date. Many suppliers have periodic changes in their supply chains. Therefore, questionnaires may be sent to our suppliers for updated information. Please note that the questionnaire will be pre-populated with your previous responses. You are able to update these prior to submitting the completed questionnaire to BD.

Q: What happens if I do not respond on time?

A: If you are not able to provide a response within the specified timeline, please immediately contact the BD RoHS Team using the email address: RoHS@bd.com.

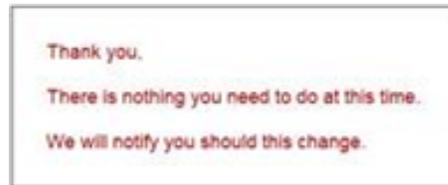
Q: I am unable to log in to the MD Supplier Portal. I receive a pop-up message as shown below. What should I do?



A: You should use the link below in order to access the MD Supplier Portal:

<http://www.actiocms.com/outreach/>. If you notice any discrepancies in the Supplier Portal please immediately communicate this to the BD RoHS Team by sending an e-mail to: RoHS@bd.com

Q: When I enter the Portal I receive a pop-up message as shown below:



A: This means that the questionnaire has expired and you are no longer able to complete and submit the questionnaire. Contact the BD RoHS Team for further instructions using the email address: RoHS@bd.com.

4. HELPFUL LINKS

RoHS Directive

<http://eur-lex.europa.eu/LexUriServ.do?uri=OJ:L:2011:174:0088:0110:EN.PDF>

RoHS Amendments

http://ec.europa.eu/environment/waste/rohs_eee/legis_en.htm

RoHS 2 FAQs

http://ec.europa.eu/environment/waste/rohs_eee/events_rohs3_en.htm

Actio Material Disclosure tool – The Portal

<http://www.actiocms.com/outreach/>

A Comprehensive Source for RoHS Information – The “Blue Guide” on the Implementation of EU Product Rules 2014:

http://ec.europa.eu/enterprise/policies/single-market-goods/documents/internal-market-for-products/new-legislative-framework/index_en.htm#h2-3

