



Our Participation in the Political Process

BD engages in public policy advocacy through ongoing, constructive and transparent interactions with government officials, policymakers and stakeholder groups. Our participation in the political process, including lobbying and the BD PAC program, is governed with Board and Management Committee oversight. All advocacy activities are directed toward advancing the Company's purpose of *Advancing the world of health*, without regard to the personal political affiliations or views of any individual BD associates at any level across the organization.

Public Policy Advocacy

We employ public policy professionals who work closely with our country and business leaders to make constructive contributions to policy discussions relevant to the Company, and to the communities in which we operate. We leverage BD's diverse expertise, global reach and collaborations with healthcare professionals, patients and others to advance sound public policy.

In areas in which BD has deep experience, the Company develops public policy positions that guide our advocacy efforts worldwide. These are developed collaboratively across our organization, informed by internal and external subject matter experts, approved by the Management Committee and reviewed annually by the Board of Directors Corporate Nominating and Governance Committee.

We currently have Global Public Policy Positions on the following topics:

- [Advancing the Safe Handling of Hazardous Drugs to Protect Healthcare Personnel](#)
- [Best Practices in Health Technology Assessment \(HTA\) Programs](#)
- [Controlling Antimicrobial Resistance](#)
- [Diabetes: Prevention, Diagnosis, Treatment and Self-Management](#)
- [Diagnosis and Treatment of Tuberculosis \(TB\) for Effective Patient Care and Control of Antibiotic Resistance](#)
- [Improving Phlebotomy and Blood Collection Practices](#)
- Medication Safety
- [Preventing Cervical Cancer through Early Detection](#)
- [Preventing Infections from Reuse of Single-Use Medical Devices](#)
- [Preventing Sharps Injuries and Other Blood Exposures](#)
- [Prevention and Control of Healthcare-Associated Infections \(HAIs\)](#)

We also engage in Policy dialogue to advance regulatory and reimbursement frameworks that ensure the safety and efficacy of medical technologies, while also enabling timely patient access to them. We promote sensible tax policies that enhance competitiveness and innovation, support policies and programs that advance biomedical research, and seek to expand access to care for all people.

Oversight, Accountability and Transparency

The Board of Directors Corporate Nominating and Governance Committee, comprised entirely of outside directors, has oversight and approving authority for BD's engagement in the political process. The Committee maintains responsibility for ensuring all BD political activities promote ethical and

transparent engagement, advance the Company purpose, and comply with applicable laws and reporting requirements.

On an annual basis, we provide the Committee with an update on the Company's public policy priorities, an itemization of PAC contributions, lobbying expenditures, information regarding our memberships, payments to trade associations and ex-U.S. political contributions (if there are any; U.S. political contributions are prohibited by Company policy).

BD's annual reporting of lobbying expenditures is available at:

http://www.bd.com/investors/corporate_governance/

We also file quarterly reports regarding our U.S. federal lobbying activities with the Office of the Clerk of the U.S. House of Representatives and the Secretary of the U.S. Senate. These reports are available by searching for "Becton Dickinson" as a "Registrant" on the U.S. Senate's website below:

http://www.senate.gov/legislative/Public_Disclosure/LDA_reports.htm

Our Participation with Trade and Policy Development Organizations

BD is a member of numerous trade associations through which we seek to advance collaborative and constructive approaches to industry engagement with policymakers and other stakeholders. BD also participates in a variety of issue advocacy coalitions and alliances that seek to advance policy proposals focused on key priorities for our Company.

We have informed our major U.S. trade associations that they are prohibited from applying any BD funds to support association-led contributions to any U.S. federal or state candidate, political party, ballot measure or referendum campaign.

Political Contributions

The Company prohibits the use of corporate funds and assets to support U.S. federal or state candidates, political parties, ballot measures or referendum campaigns. Exceptions to this policy require approval by the CEO, General Counsel and a designated member of the Board of Directors Corporate Nominating and Governance Committee. To date, no exceptions have been sought or approved.

Any political contributions outside the U.S. must meet all of the following conditions:

- Compliant with all applicable laws within the relevant country
- Compliant with all relevant U.S. laws, including the Foreign Corrupt Practices Act
- Compliant with the BD Code of Conduct
- Verified as compliant by internal and external legal counsel expert in the U.S. and other applicable national and local law, assuring the most stringent standard is applied
- Publicly reported, on at least an annual basis, by formal bodies governing the local and/or national political process
- Approved by the Company CEO, General Counsel, Country Leader and designated member of the Board of Directors Corporate Nominating and Governance Committee

In all cases, BD policy prohibits directors and employees from using company resources to promote their personal political views, causes or candidates, and specifies that the company will not directly or indirectly reimburse any personal political contributions or expenses.

BD is a signatory of the AdvaMed Code and other applicable codes of conduct from around the world. Our associates are trained in these Codes and the BD Code of Conduct, as well as applicable national and local laws that govern advocacy.

BD's Political Action Committee: BD PAC

As permitted under U.S. law, the Company operates a political action committee. The BD PAC is a mechanism to enable eligible U.S. associates to voluntarily support candidates for elected office who share BD's perspectives and approaches to public policy issues. BD has not authorized the establishment of any political action committees operating on the state or local level.

Contributions to BD PAC are entirely voluntary and are governed by the BD PAC By-Laws. BD provides administrative support to the PAC, as permitted under federal law.

The BD PAC is governed by its board of directors (members include senior executives and representatives of the Policy and Market Access Function), which appoints the officers of the PAC and supervises and directs the PAC's administration, solicitation campaigns, contributions and compliance with applicable law and BD PAC's By-Laws.

The BD PAC By-Laws, approved by the BD PAC board of directors, outline key factors to be considered for BD PAC contributions including the following:

- Support for policies that help advance our purpose—*Advancing the world of health*
- BD facility in district
- BD and/or medical technology sector issue support
- Congressional leadership positions
- Key committee assignments

BD's annual reporting of itemized PAC contributions, and any other corporate contributions that may be made, is available at: http://www.bd.com/investors/corporate_governance/

All contributions made by the BD PAC are also publicly reported on government agency websites, including the Federal Election Commission's website (www.fec.gov).

The BD PAC is audited by an independent auditor every two years for compliance with policy and legal requirements.

Violations and Compliance

BD maintains robust processes for reporting of violations and validating compliance with law and Company policy. Company personnel who believe they have witnessed illegal or unethical behavior relating to the Company's political activities are encouraged to discuss the matter with their manager, senior managers, Human Resources representatives, the Legal Department, or the Compliance Department.

Actual or potential violations may be reported without risk of retaliation by using the Confidential ETHICS HELPLINE (1-800-821-5452).

Company policies and by-laws governing BD's political activities may be subject to periodic compliance validation and/or Internal Audit review to determine the effectiveness of implementation and on-going compliance with Policy. Findings and mitigation strategies may be reviewed with appropriate

stakeholders. Significant exceptions may be reported to the Corporate Nominating and Governance Committee.