

BD Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act Statement for the financial year ending 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 resonates with BD associates around the world. BD's corporate culture is guided by our Core Values:

- We do what is right;
- We are all accountable
- We thrive on innovation and demand quality
- 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 Canada Fighting Against Forced Labour and Child Labour in Supply Chain Act of 2023 requires certain organizations carrying out business in Canada to publish a statement regarding forced labour and child labour. The following describes BD's efforts in this regard.

### **Organization, Business Structure, and Supply Chains**

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 starting October 1, 2022, and ending on September 30, 2023 ("FY'2023"). In FY'2023, BD operated three worldwide segments: BD Medical, which included Medication Management Solutions, Medication Delivery Solutions, and Pharmaceutical Systems; BD Life Sciences, which included Biosciences and Integrated Diagnostic Solutions; and BD Interventional, which included Surgery, Peripheral Interventional 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 over 30,000 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 on the New York Stock Exchange (BDX). BD's main operations include the provision and delivery of medical technology. Globally, this includes the direct employment of workers to manufacture products, research and development of products and services, global sales and marketing programs, and distribution of goods and services.

BD's Canada (Bard Canada Inc., Becton Dickinson Canada Inc., Synergie Medicale BRG Inc., VAS-Cath Incorporated, and GeneOhm Sciences Canada ULC) sites comprise over 700 associates with head offices in Mississauga, Ontario, technical service centers in Mississauga and Quebec City, Quebec along with a manufacturing location in Quebec City. In Canada, BD's operations include marketing, sales, and distribution of goods and services.

### ***Prevention and reduction of risks of forced labour and child labour***

BD implements a human rights due diligence process to identify, mitigate and prevent human right abuses, both within our own operations and within our wider supply chain. 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 and covers all of the human rights laid out in these laws, which include forced labour and child labour.

#### **Own operations**

For our own operations, including our manufacturing sites, BD maintains robust Human Resource, 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.

#### **In our Supply Chain**

Within our supply chain, where our highest risk of human rights abuses, including forced labour and child labour, exists, we implement a due diligence process to understand risk and evaluate suppliers. This process puts suppliers through several layers of risk assessment, online and/or in person assessment, and assigns corrective actions if their practices are deemed insufficient to prevent human rights abuses. This process is detailed in a later section of this report.

It is recognized that the risk of forced labour and child labour are elevated in certain geographies and in certain industries. BD prioritizes due diligence based on intelligence of this nature from third party sources (including known actor lists, third party media monitoring, and other intelligence sources) and is constantly evaluating and adjusting how we prioritize suppliers for deeper assessment based on this understanding. We also understand that our highest risk may not sit in our tier-1 supplier network and have integrated supply chain mapping to tier-5 to better identify if known actors exist within our supply chain or to evaluate risk based on a specific country/industry. This is detailed later in this report.

This supply chain due diligence process is administered by BD at the global level, every supplier (both direct and indirect) is analyzed for risk and put through the due diligence process if they are deemed in scope for analysis. This process allows BD to address the highest risk of child labour and forced labour, rather than addressing only the suppliers specific to BD Canada. This also ensures that goods produced by BD outside of Canada and imported into the country have already been assessed for these risks.

In addition to our human rights due diligence activities, BD's Supplier Quality team performs announced on-site audits of suppliers. The audit procedure for these quality audits of suppliers specifically calls out compliance with the BD Expectations for Suppliers (detailed later in this report) and addresses any observed human rights or other Environmental, Social, and Corporate Governance (ESG) abuses. 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 below).

### **Supplementary information**<sup>1</sup>

BD is also subject to the reporting requirements under the following human rights supply chain legislation :

- The United Kingdom’s Modern Slavery Act
- Australia’s Modern Slavery Act
- California’s Transparency in Supply Chains Act
- Norway Supply Chain Transparency Act
- Germany Supply Chain Act

### ***Policies and Due Diligence Processes in relation to forced labour and child labour***

#### BD Policies

BD is committed to acting in compliance with all applicable laws and BD's ethical standards and ensuring that no instances of forced labour and child labour occur in any part of our own business 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 child, 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.
- [BD Expectations for Suppliers](#) (updated as part of our biannual update process in FY'2023) - prohibits the use of involuntary labor of any kind, including slave labor, indentured/debt labor, forced labor, or prison labor, prohibits child labour, and any other human rights abuses by BD suppliers. This document details the minimum standards that all our suppliers must meet with regards to human rights in addition to other topics. Compliance has been evaluated primarily through written acknowledgements and through periodic audits based on the level of risk. BD includes language in our contracts, purchase orders, supplier terms and conditions, and supplier on-boarding process, among others, that requires its suppliers to represent, warrant, and/or certify that they comply with the EFS and all relevant laws (including labor laws) 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.-
- The [BD Global Speaking Up Policy](#) BD 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.

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<sup>1</sup> To align with subsection 11(3) of the law, we have detailed sections here that were not covered earlier in this report. Structure, activities and supply chains are addressed earlier and therefore not detailed here again.

Practices geared toward ensuring that forced labour or child labour do not exist in our workforce are incorporated, such as:

- 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.
- We incorporate age verification aligned with International Labor Organization's principles into our new hire background screening process to ensure that child labour is not used.

### BD Due Diligence

Within our supply chain, where our highest risk of human rights abuses, including forced labour and child labour exists, we implement a due diligence process to understand risk and evaluate suppliers. Suppliers are first evaluated by a third party to understand human rights risk, which includes child labour and forced labour 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 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. This prioritization is ever evolving as we monitor emerging and ongoing risks, and is guided by third party risk intelligence solutions, changing awareness of human rights issues, and compliance requirements of individual countries where we operate. Results of this desktop assessment may end in review by Responsible Sourcing Operating Committee, assignment of corrective actions, and/or in-person audits, depending on the level of risk identified.

These desktop audits specifically address key labor and human Rights practices and ask suppliers 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. It is expected that suppliers are actively engaged to correct practices highlighted in the Corrective Action program and that this work be done in a timely manner. The Responsible Sourcing Operating Committee reviews supplier engagement and targets further action as part of this work.

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.

### **Assessing and Managing Risk**

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.

#### **Within BD**

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

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 facility-level 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.

We continue to advance our Good Jobs Strategy, which puts the operator at the center of everything we do. 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 fair wages and benefits, workplace safety and working conditions.

#### **Within our Supply Chain**

The greatest risk for instances of child labour or forced labour to BD is within our Supply Chain. With a global supply chain of over 30,000 tier 1 suppliers, the size of our supply chain presents a risk that we may not discover high risk suppliers for further evaluation through existing due diligence processes. This is due to 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 potential for child or forced labour in our supply base. We mitigate these risks through due diligence processes that focus on prioritizing known high-risk factors, such as a supplier's manufacturing location, both for existing suppliers and for new suppliers.

Suppliers are analyzed, via a third party, against geographic or location risk and geopolitical risk as it relates to forced labour 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 trained and encouraged to report concerns through the same process. 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.

### **Measures taken to remediate forced labour or child labour**

**Within our own operations, BD has not identified any instances of forced labour or child labour and therefore has no instances of remediation.**

#### **Within our Supply Chain**

BD has assessed our entire tier-1 supply chain against our initial risk assessment, escalated higher risk suppliers for deeper assessment/audit, and has performed desktop audits for over 1,150 suppliers. Through this wider due diligence process we have identified 68 suppliers that represent an elevated risk for human rights abuses, including forced or child labour. These suppliers do not have confirmed instances of forced labour, child labour, or other human rights abuses in their risk profile, but their practices and policies were deemed by BD to need improvement in order to prevent any of these abuses. These suppliers have all been assigned corrective actions and are actively working to demonstrate improvements. The Responsible Sourcing Operating Committee tracks supplier efforts and will intervene in a supplier relationship if the supplier is deemed to not be implementing corrective actions in a timely manner or in a manner intended to reduce this risk. This committee will also intervene if a supplier is thought to be engaged in activities related to state sponsored forced labour and will immediately seek to dissolve the relationship with that supplier.

We have not identified any confirmed instances of forced labour or child labour within our supply chain. We have therefore not participated in any remediation efforts, but an internal guidance document exists to guide efforts, under ownership of the Responsible Sourcing Operating Committee, if we should need to do so.

### ***Training and Capacity Building***

BD takes steps to educate associates and third parties so they can identify forced labour, child labour 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 training 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 over 10,000 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.

- Supplier quality auditors are provided an additional, more in-depth training specifically for quality auditors who regularly visit supplier locations to help them better identify and report suspected human rights violations, with a focus on doing so in a manner that maintains their safety.
- BD provides both internal and external trainings on the Expectations for Suppliers document
  - Internally, all procurement functions attend a required training around the Expectations for Suppliers as it is updated. This training details updates made to the document, implementation of the document, and how to report suspected non-compliance.
  - For Suppliers, BD administers online training on our Expectations for Suppliers to all suppliers. These trainings include definitions of forced labor, modern slavery, and human trafficking, tools on identifying red flags and high-risk areas, and guidance on best practices. This training also includes updates on any changes made to the Expectations for Suppliers in the latest version and links suppliers to tools and resources to continuously improve human rights and other ESG related practices.
  - BD Responsible Sourcing Toolkit – this document was developed to help suppliers ensure compliance with the BD Expectations for Suppliers. It was developed as a training/resource document – as a starting point for suppliers who want to learn more. It provides access to external best practice, tools and resources, and external organizations to help suppliers track the changing practices in topics such as human rights, environmental sustainability, and risk. BD updates this document regularly to ensure suppliers have access to changing best practice.

#### *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 types 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.

#### **Measurement and Effectiveness**

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 Key Performance Indicators (KPIs) to track this work.

In FY'2021 we established KPIs that include:

1. We will strengthen our 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 1,150 supplier audits. To date, this represents 68 percent of our total spend having completed a supplier scorecard.

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

We also participate in industry working groups where we learn best practices that have been implemented by companies across sectors, and we seek to apply those where they add value to our programs.

BD strives to continuously improve its programs to ensure compliance with applicable laws and BD's ethical standards and to meet the expectations of our customers, our shareholders, our associates, our communities and other stakeholders.

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 Board of Directors for Bard Canada Inc., Becton Dickinson Canada Inc. (Registration #100448760), Synergie Medicale BRG Inc. (Registration #1315106-9), VAS-Cath Incorporated (Registration #1225385), and GeneOhm Sciences Canada ULC (Registration #896961141) on March 13, 2024.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

A handwritten signature in black ink that reads "Gary DeFazio".

Gary DeFazio  
*Senior Vice President, Corporate Secretary and Associate General Counsel*  
April 22, 2024

I have the authority to bind Bard Canada Inc., Becton Dickinson Canada Inc., Synergie Medicale BRG Inc., VAS-Cath Incorporated, and GeneOhm Sciences Canada ULC.