BD supplier Conflict Minerals guidance

October 2023

BD
Advancing the world of health™

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1. Conflict minerals introduction

BD is subject to the U.S. Conflict Minerals Rule and has implemented processes to meet the Rule's requirements.

BD expects its suppliers to cooperate with BD compliance efforts and to source responsibly, respect human rights and not contribute to conflict. Without limiting the foregoing, BD expects that its suppliers will not source tin, tantalum, tungsten or gold from sources that directly or indirectly finance or benefit armed groups in the Conflict Affected Region.

As further described below, Conflict Minerals are defined to include tantalum, tin, tungsten and gold (also known as 3TG), from any source, whether supplied in raw form or as part of a product of component, and whether added by the supplier or subcontractor or an earlier direct or indirect participant in the supply chain. There is no *de minimis* exception, which means that 3TG in any quantity are within the scope of the Conflict Minerals Rule and must be reported by suppliers. The current Conflict Affected Region is defined as the Democratic Republic of the Congo and its adjacent countries, which include Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia. However, 3TG from any region of the world contained in products, components or raw materials provided to BD, whether or not they are known or believed to support conflict, must be reported to BD.

In furtherance of the foregoing expectation and the obligations of BD under the Conflict Minerals Rule, applicable BD suppliers (as defined by the BD Supply Base Compliance group) will be expected to complete a questionnaire concerning the usage and source of any 3TG in the products supplied to us. As part of gathering the information for the questionnaire, applicable BD suppliers will be expected to conduct a reasonable country of origin inquiry and/or due diligence, as applicable, in accordance with the Conflict Minerals Rule and the Organisation for Economic Co-operation and Development's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the OECD Guidance).

This guidance document contains important compliance information for BD suppliers. However, it does not contain all of the information that you may need to design and implement an appropriate compliance program. Accordingly, suppliers and subcontractors are expected to fully familiarize themselves with the Conflict Minerals Rule and the OECD Guidance to the extent necessary to meet BD compliance expectations.

BD has put in place processes and procedures to help ensure that we receive responsibly sourced materials from our suppliers and subcontractors, including:

1. Requiring applicable suppliers and subcontractors to provide origin information on the 3TG contained in their products.
2. Communicate to applicable suppliers and subcontractors our expectation that they: a) adopt policies on responsible mineral sourcing that are consistent with our Conflict Minerals Policy; b) establish due diligence frameworks and management systems that are consistent with the OECD Guidance; and c) 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 policy, we intend to work with and encourage them to source responsibly. Where these efforts fail or we believe that further engagement with a supplier or subcontractor is inappropriate, we will re-evaluate our business relationship.

We discourage the embargoing of 3TG from the Conflict Affected Region and advocate the responsible sourcing of 3TG from the region.

Our Conflict Minerals Policy is available at http://www.bd.com/en-us/company/sustainability-at-bd/ corporate-policies-and-resources-for-suppliers.

Any questions concerning this supplier guidance or the policy should be directed to ConflictMinerals@bd.com.

Conflict Minerals

Conflict Minerals may include:

Tantalum (Coltan)

- Used in capacitors, cameras, laptops and medical products.

Tin (Cassiterite)

- Used in solder (circuit boards) and medical products.

Tungsten (Wolframite)

- Very dense material, used in vibration devices.

Gold

- Used in electronics and medical products.

Note that these are only selected uses of 3TG that may apply to BD products. They are contained in many other products as well.

The focus is currently on 3TGs mined within the Conflict Affected Region. However, as indicated above, 3TG that originated from other regions of the world also must be reported.

1.1 Regulatory background

The first regulation of its kind relating to the use of Conflict Minerals (tantalum, tin, tungsten and gold) began with the adoption of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. In August 2012, the Securities and Exchange Commission (SEC) adopted the final rule pursuant to Section 1502, widely known as the Conflict Minerals Rule (Rule 13p-1 under the Securities Exchange Act and Form SD).

The Conflict Minerals Rule is an ongoing annual calendar year compliance requirement that requires public companies to disclose to the SEC, and publicly, their use and the related origin of 3TG. Under the Conflict Minerals Rule, public companies are required to make inquiries of their supply chains. As a result, BD requires the cooperation and assistance of its suppliers to meet its compliance obligations.

1.2 Regulation specifics

The regulation generally requires, among other things, that U.S. publicly traded companies such as BD:

- Make public their use of 3TG from the Conflict Affected Region by describing the processor and country of origin.
- Describe (to a lesser extent) out-of-region 3TG usage.
- Conduct, at a minimum, third party inquiries into the supply chain for traceability purposes.

Annually updated results must be reported to the SEC via Form SD and a Conflict Minerals Report. The Conflict Minerals Rule applies to all included 3TG that is necessary to the functionality or production of a finished product that a public company manufactures or contracts to manufacture. As noted above, there is no *de minimis* exception in the scope of the quantity of 3TG; even trace amounts of 3TG included in a product come under the Conflict Minerals Rule and must be reported to BD.

The information contained herein is only a brief summary of portions of the Conflict Minerals Rule. Suppliers are expected to fully familiarize themselves with the Conflict Minerals Rule to the extent necessary to meet their reporting requirements to BD and other BD compliance expectations.

1.3 Reporting and inquiry requirements

The annual reporting requirements of the Conflict Minerals Rule require BD to, under certain circumstances, describe which products contain 3TG. A reasonable country of origin inquiry within the meaning of the Conflict Minerals Rule must be conducted by BD, and in turn by its suppliers, to determine whether 3TG was sourced from (or if there is reason to believe that they may have been sourced from) the Conflict Affected Region. If 3TG was sourced from (or if there is reason to believe that they may have been sourced from) the region, BD, and in turn its suppliers, must conduct additional due diligence to determine whether the 3TG benefitted armed groups in the region. The origin of 3TG added to a product or component by any participant in the supply chain must be examined.

To enable BD to meet its requirements under the Conflict Minerals Rule, suppliers will receive surveys requiring them to provide information concerning the use and source of 3TG in the products that they provide to BD, as well as other related information. This procedure will occur annually or when sourcing changes have been made. The survey will be based on a template created by the Responsible Minerals Initiative. Suppliers will be able to submit information into the survey via the online SustainHub (Conflict Minerals Platform).

2. Responsible Minerals Initiative (RMI)

The Conflict Minerals Reporting Template (the Template or CMRT) was created by the Responsible Minerals Initiative, formerly known as the Conflict-Free Sourcing Initiative (CFSI), as a common means for the collection of sourcing and other information related to 3TG. Many companies have adopted this Template as an element of their reasonable country of origin and due diligence program to help verify the responsible sourcing of 3TG and to support compliance with the Conflict Minerals Rule. Each year, the RMI updates the Template. Suppliers are expected to use and submit information on the Template Revision for the applicable compliance year. If a supplier uploads a CMRT instead of filling out the questionnaire within SustainHub, Revision 6.01 or later of the Template must be submitted to BD for calendar year 2023. The Template can be downloaded without cost from the RMI website.

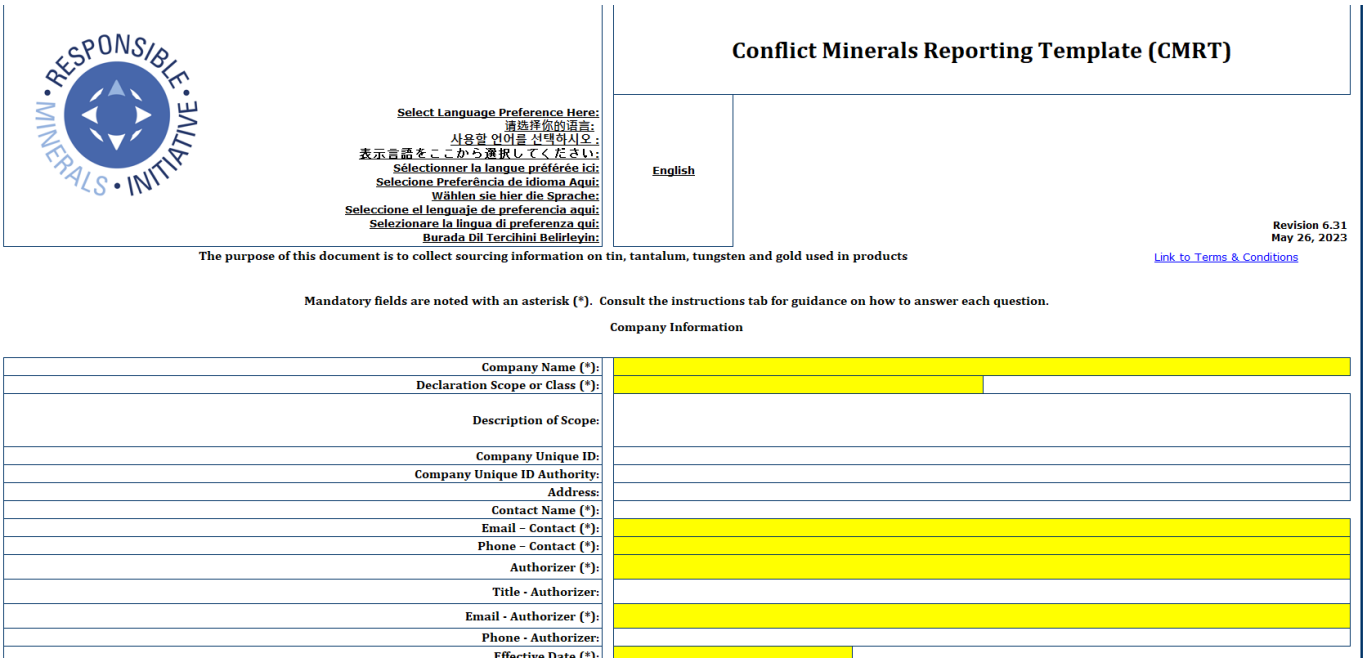
Non-conforming responses, such as letters, emails, older versions of the Template or verbal assurances, will not be accepted.

Supplier responses also must only include 3TG content for the relevant calendar year of the request and must pertain to the full compliance period; prior year information is not to be provided. This means that BD suppliers will need to request information from their suppliers each year, rather than relying on prior year or older supplier submissions.

2.1 Content of the Conflict Minerals Reporting Template

The CMRT contains instructions for its completion. However, suppliers are expected to undertake any additional training or education that is necessary to meet their compliance obligations to BD, including the accurate and thorough completion of the Template.

Please see below screenshots of portions of each separate tab located within the CMRT. These screenshots do not include all of the Template content. Please see the actual Template for the complete content of each tab.



Conflict Minerals Reporting Template (CMRT)

Select Language Preference Here:
请选择你的语言:
사용할 언어를 선택하시오 :
表示言語をここから選択してください:
Sélectionner la langue préférée ici:
Selecione Preferência de idioma Aqui:
Wählen sie hier die Sprache:
Seleccione el lenguaje de preferencia aqui:
Selezionare la lingua di preferenza qui:
Burada Dil Tercihini Belirleyin:

English

Revision 6.31
May 26, 2023

The purpose of this document is to collect sourcing information on tin, tantalum, tungsten and gold used in products

Link to Terms & Conditions

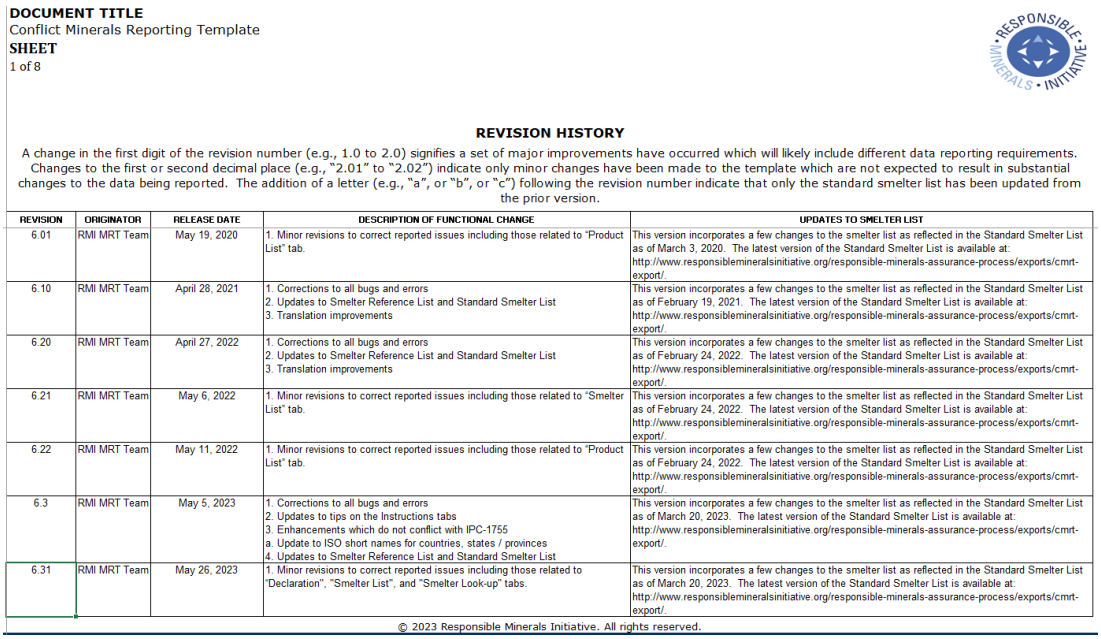
Mandatory fields are noted with an asterisk (*). Consult the instructions tab for guidance on how to answer each question.

Company Information

Company Name (*):	
Declaration Scope or Class (*):	
Description of Scope:	
Company Unique ID:	
Company Unique ID Authority:	
Address:	
Contact Name (*):	
Email – Contact (*):	
Phone – Contact (*):	
Authorizer (*):	
Title - Authorizer:	
Email - Authorizer (*):	
Phone - Authorizer:	
Effective Date (*):	

2.1.1 Revision

This tab lists all improvements made to the previous versions of CMRT - functional changes and updates to Smelter List.



DOCUMENT TITLE
Conflict Minerals Reporting Template
SHEET
1 of 8

REVISION HISTORY

A change in the first digit of the revision number (e.g., 1.0 to 2.0) signifies a set of major improvements have occurred which will likely include different data reporting requirements. Changes to the first or second decimal place (e.g., "2.01" to "2.02") indicate only minor changes have been made to the template which are not expected to result in substantial changes to the data being reported. The addition of a letter (e.g., "a", or "b", or "c") following the revision number indicate that only the standard smelter list has been updated from the prior version.

REVISION	ORIGINATOR	RELEASE DATE	DESCRIPTION OF FUNCTIONAL CHANGE	UPDATES TO SMELTER LIST
6.01	RMI MRT Team	May 19, 2020	1. Minor revisions to correct reported issues including those related to "Product List" tab.	This version incorporates a few changes to the smelter list as reflected in the Standard Smelter List as of March 3, 2020. The latest version of the Standard Smelter List is available at: http://www.responsiblemineralsinitiative.org/responsible-minerals-assurance-process/exports/cmrt-export/.
6.10	RMI MRT Team	April 28, 2021	1. Corrections to all bugs and errors 2. Updates to Smelter Reference List and Standard Smelter List 3. Translation improvements	This version incorporates a few changes to the smelter list as reflected in the Standard Smelter List as of February 19, 2021. The latest version of the Standard Smelter List is available at: http://www.responsiblemineralsinitiative.org/responsible-minerals-assurance-process/exports/cmrt-export/.
6.20	RMI MRT Team	April 27, 2022	1. Corrections to all bugs and errors 2. Updates to Smelter Reference List and Standard Smelter List 3. Translation improvements	This version incorporates a few changes to the smelter list as reflected in the Standard Smelter List as of February 24, 2022. The latest version of the Standard Smelter List is available at: http://www.responsiblemineralsinitiative.org/responsible-minerals-assurance-process/exports/cmrt-export/.
6.21	RMI MRT Team	May 6, 2022	1. Minor revisions to correct reported issues including those related to "Smelter List" tab.	This version incorporates a few changes to the smelter list as reflected in the Standard Smelter List as of February 24, 2022. The latest version of the Standard Smelter List is available at: http://www.responsiblemineralsinitiative.org/responsible-minerals-assurance-process/exports/cmrt-export/.
6.22	RMI MRT Team	May 11, 2022	1. Minor revisions to correct reported issues including those related to "Product List" tab.	This version incorporates a few changes to the smelter list as reflected in the Standard Smelter List as of February 24, 2022. The latest version of the Standard Smelter List is available at: http://www.responsiblemineralsinitiative.org/responsible-minerals-assurance-process/exports/cmrt-export/.
6.3	RMI MRT Team	May 5, 2023	1. Corrections to all bugs and errors 2. Updates to tips on the Instructions tabs 3. Enhancements which do not conflict with IPC-1755 a. Update to ISO short names for countries, states / provinces 4. Updates to Smelter Reference List and Standard Smelter List	This version incorporates a few changes to the smelter list as reflected in the Standard Smelter List as of March 20, 2023. The latest version of the Standard Smelter List is available at: http://www.responsiblemineralsinitiative.org/responsible-minerals-assurance-process/exports/cmrt-export/.
6.31	RMI MRT Team	May 26, 2023	1. Minor revisions to correct reported issues including those related to "Declaration", "Smelter List", and "Smelter Look-up" tabs.	This version incorporates a few changes to the smelter list as reflected in the Standard Smelter List as of March 20, 2023. The latest version of the Standard Smelter List is available at: http://www.responsiblemineralsinitiative.org/responsible-minerals-assurance-process/exports/cmrt-export/.

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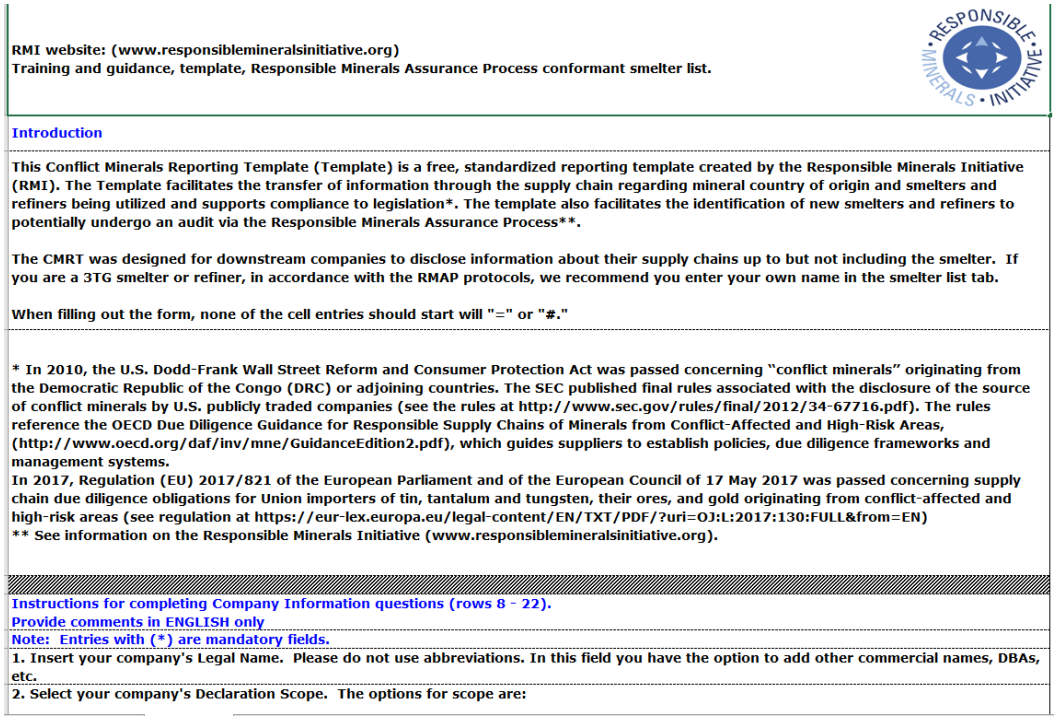
2.1.2 Instructions

This tab explains how to complete the CMRT.



RMI website: (www.responsiblemineralsinitiative.org)
Training and guidance, template, Responsible Minerals Assurance Process conformant smelter list.

Introduction

This Conflict Minerals Reporting Template (Template) is a free, standardized reporting template created by the Responsible Minerals Initiative (RMI). The Template facilitates the transfer of information through the supply chain regarding mineral country of origin and smelters and refiners being utilized and supports compliance to legislation*. The template also facilitates the identification of new smelters and refiners to potentially undergo an audit via the Responsible Minerals Assurance Process**.

The CMRT was designed for downstream companies to disclose information about their supply chains up to but not including the smelter. If you are a 3TG smelter or refiner, in accordance with the RMAP protocols, we recommend you enter your own name in the smelter list tab.

When filling out the form, none of the cell entries should start will "=" or "#."

* In 2010, the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act was passed concerning "conflict minerals" originating from the Democratic Republic of the Congo (DRC) or adjoining countries. The SEC published final rules associated with the disclosure of the source of conflict minerals by U.S. publicly traded companies (see the rules at http://www.sec.gov/rules/final/2012/34-67716.pdf). The rules reference the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, (http://www.oecd.org/daf/inv/mne/GuidanceEdition2.pdf), which guides suppliers to establish policies, due diligence frameworks and management systems.
In 2017, Regulation (EU) 2017/821 of the European Parliament and of the European Council of 17 May 2017 was passed concerning supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas (see regulation at https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L:2017:130:FULL&from=EN)
** See information on the Responsible Minerals Initiative (www.responsiblemineralsinitiative.org).

Instructions for completing Company Information questions (rows 8 - 22).
Provide comments in ENGLISH only
Note: Entries with (*) are mandatory fields.
1. Insert your company's Legal Name. Please do not use abbreviations. In this field you have the option to add other commercial names, DBAs, etc.
2. Select your company's Declaration Scope. The options for scope are:

2.1.3 Definitions

This tab provides the meaning of selected items within the CMRT.

ITEM	DEFINITION
3TG	Tantalum, tin, tungsten, gold
Authorizer	This field identifies the person responsible for the content of the declaration. The authorizer may be a different individual from the contact person. It is not correct to use the words "same" or similar identification to provide the name of the authorizer.
Conflict-Affected and High-Risk Area (CAHRA)	Conflict-affected and high-risk areas are areas in a state of armed conflict, fragile post-conflict areas, as well as areas witnessing weak or non-existing governance and security, such as failed states, and widespread and systematic violations of international law, including human rights abuses.
Conflict Mineral	As defined in 2010 United States legislation, Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502(e)(4): CONFLICT MINERAL.—The term "conflict mineral" means— (A) columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives; or (B) any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country. (available at http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf)
Covered Country(ies)	Covered Country(ies) as defined by the United States Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. These countries include the Democratic Republic of the Congo and the nine countries with which it shares an internationally recognized border: Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, Zambia.
Declaration Scope or Class	For the purposes of this template, "scope" describes the applicability of the information provided by the reporting company. The scope may encompass the entirety of a company's services and/or products, or at a company's discretion, the template may be used to report on a specific product (or products), or, be 'User defined'. The 'User defined' scope selection or class may be used to describe any subset of a company's operation or product portfolio.

2.1.4 Questionnaire

This tab contains the declaration form. Yellow fields are mandatory when completing.

Conflict Minerals Reporting Template (CMRT)

Select Language Preference Here:
请选择你的语言:
사용할 언어를 선택하시오 :
表示言語をここから選択してください:
Sélectionner la langue préférée ici:
Selecione Preferência de idioma Aqui:
Wählen sie hier die Sprache:
Seleccione el lenguaje de preferencia aquí:
Selezionare la lingua di preferenza qui:
Burada Dil Tercihini Belirleyin:

English

Revision 6.31
May 26, 2023

The purpose of this document is to collect sourcing information on tin, tantalum, tungsten and gold used in products

Link to Terms & Conditions

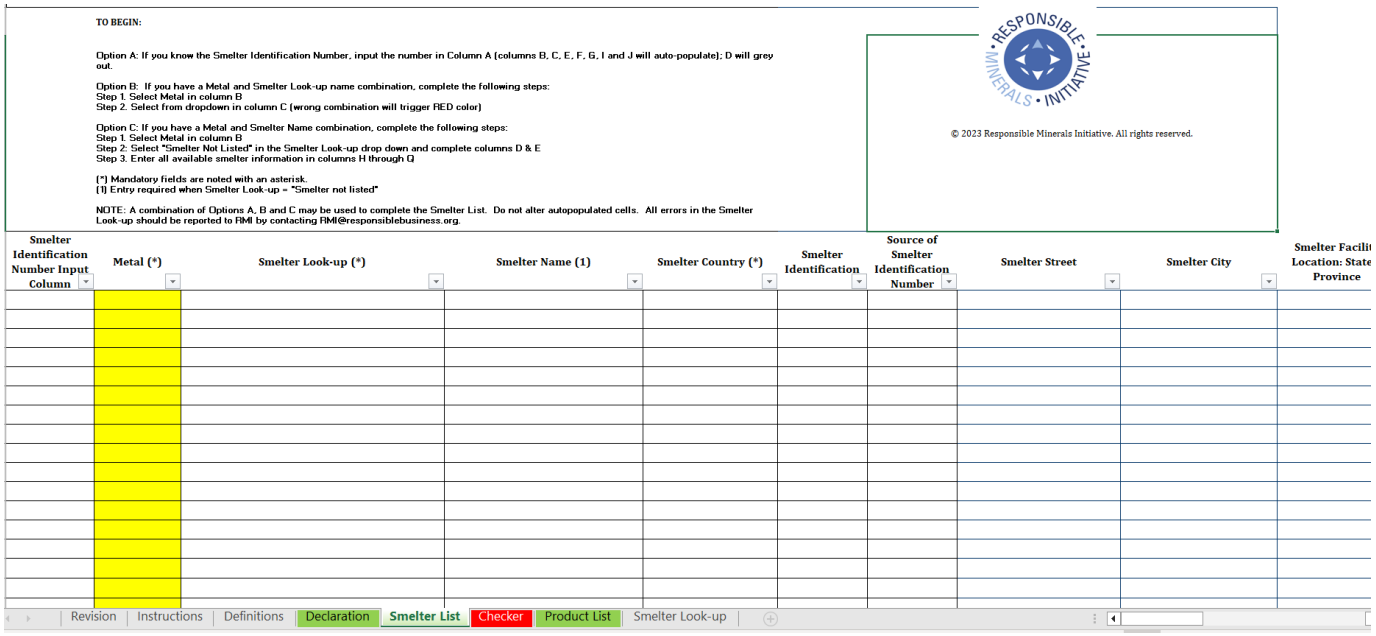
Mandatory fields are noted with an asterisk (*). Consult the instructions tab for guidance on how to answer each question.

Company Information

Company Name (*):	
Declaration Scope or Class (*):	
Description of Scope:	
Company Unique ID:	
Company Unique ID Authority:	
Address:	
Contact Name (*):	
Email – Contact (*):	
Phone – Contact (*):	
Authorizer (*):	
Title - Authorizer:	
Email - Authorizer (*):	
Phone - Authorizer:	
Effective Date (*):	

2.1.5 Smelter List

This tab is to be used to provide information about smelters.



TO BEGIN:

Option A: If you know the Smelter Identification Number, input the number in Column A (columns B, C, E, F, G, I and J will auto-populate); D will grey out.

Option B: If you have a Metal and Smelter Look-up name combination, complete the following steps:
Step 1. Select Metal in column B
Step 2. Select from dropdown in column C (wrong combination will trigger RED color)

Option C: If you have a Metal and Smelter Name combination, complete the following steps:
Step 1. Select Metal in column B
Step 2: Select "Smelter Not Listed" in the Smelter Look-up drop down and complete columns D & E
Step 3. Enter all available smelter information in columns H through Q

(*) Mandatory fields are noted with an asterisk.
(1) Entry required when Smelter Look-up = "Smelter not listed"

NOTE: A combination of Options A, B and C may be used to complete the Smelter List. Do not alter autopopulated cells. All errors in the Smelter Look-up should be reported to RMI by contacting RMI@responsiblebusiness.org.

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Smelter Identification Number Input Column	Metal (*)	Smelter Look-up (*)	Smelter Name (1)	Smelter Country (*)	Smelter Identification	Source of Smelter Identification Number	Smelter Street	Smelter City	Smelter Facili Location: State Province

Revision | Instructions | Definitions | Declaration | Smelter List | Checker | Product List | Smelter Look-up

2.1.6 Checker

This tab is used to ensure that all required fields have been populated before submitting CMRT.

To ensure all required fields have been populated before submitting to your customers review form for any line items highlighted in red

Required fields remaining to be completed
52

Click here to return to Declaration tab Required Fields	Click here to return to Smelter List Answer provided	Click here to return to Product List Notes	Hyperlink to source
Company Name (*):		Provide your company name on the Declaration tab cell D8	Click here to enter Company Name
Declaration Scope or Class (*):		Select the scope of declaration on the Declaration tab cell D9	Click here to enter Declaration Scope
Description of Scope:		Complete	
Contact Name (*):		Provide contact name in Declaration tab cell D15	Click here to enter Contact Name
Email – Contact (*):		Provide a valid email for contact in Declaration tab cell D16	Click here to enter Email-Contact
Phone – Contact (*):		Provide a phone number for contact in Declaration tab cell D17	Click here to enter Phone-Contact
Authorizer (*):		Provide authorized company representative contact name in Declaration tab cell D18	Click here to enter an Authorized Company Representative's name
Email - Authorizer (*):		Provide an email for authorized company representative on Declaration tab cell D20	Click here to enter Representative's email
Effective Date (*):		Provide date the form was completed on Declaration tab cell D22	Click here to enter Date of Completion

2.1.7 Product list

This tab is used to provide a product list when completing CMRT at the product level.

Completion required only if reporting level "Product (or List of Products)" selected on the 'Declaration' worksheet.

Click here to return to Declaration tab

Manufacturer's Product Number (*)	Manufacturer's Product Name	Comments

3. SustainHub (Conflict Minerals Platform) - guidance for suppliers

SustainHub (Conflict Minerals Platform) is a web application that is used for compliance data collection. It is also a communication tool between BD and its suppliers. Communication with suppliers is initiated by the BD Conflict Minerals Team sending an email with a link to the SustainHub. The supplier will use the link to access the Conflict Minerals questionnaire. Further communication between BD and suppliers can be conducted using: ConflictMinerals@bd.com.

3.1 Login to the portal for the first time

3.1.1 Receiving the email

As a BD supplier you shall receive an email from ConflictMinerals@bd.com that will contain:

- A link to the registration in SustainHub.
- A unique request key.

3.1.2 First time login

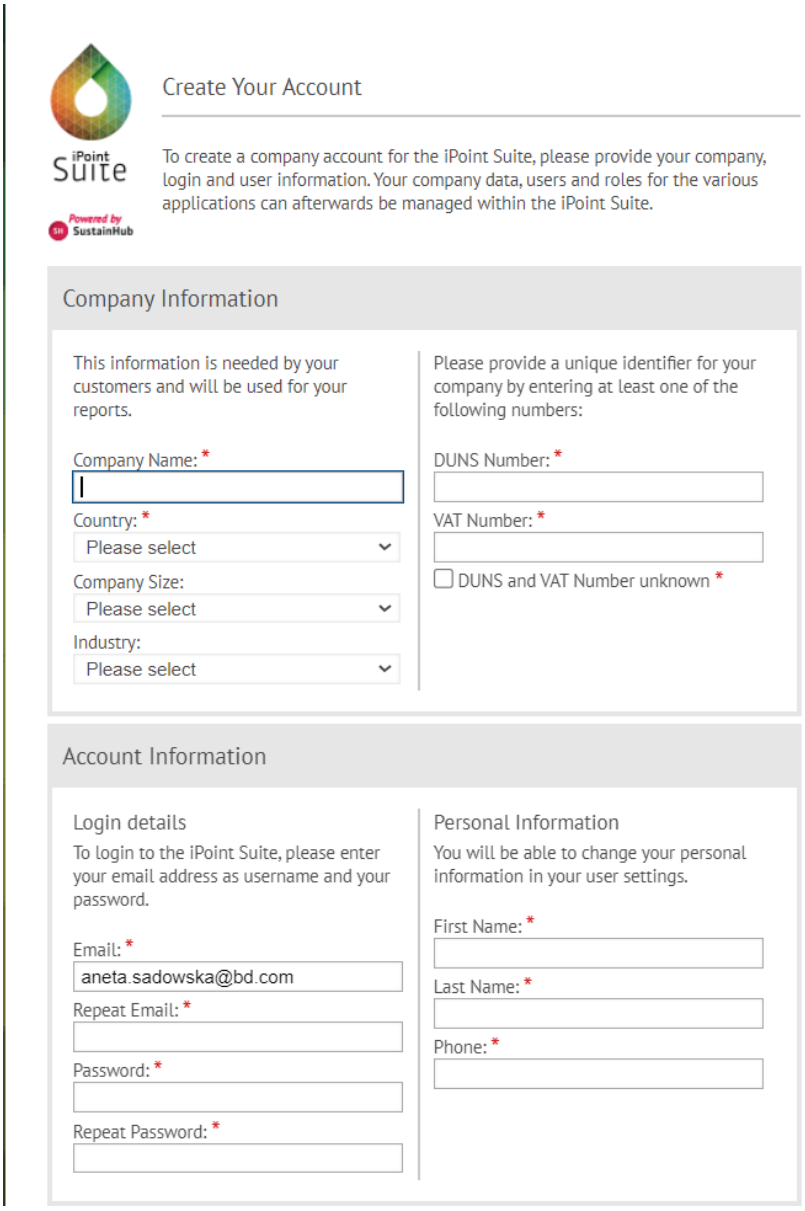
Step 1: In the initial email message you will receive a link to SustainHub. To enter the portal click on the link.

NOTE: If you are not the right person to answer that kind of request, forward the registration email to the correct person. Next steps shall be performed by appropriate person within your company.

Step 2: You will be asked to verify your email address and set a password. Since this is the registration, you will be asked to verify your contact information by providing details such as your first and last name, phone number, company name and country, as shown on the screen below. Once completed, click the 'Create Account' button.

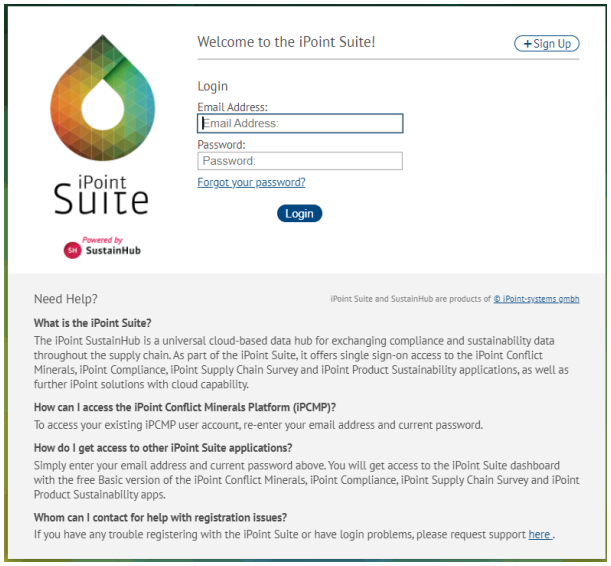
NOTE: All fields with a red asterisk are required.

NOTE: In order to be able to complete a BD request, a BASIC type of license is required. The BASIC license is free of charge.



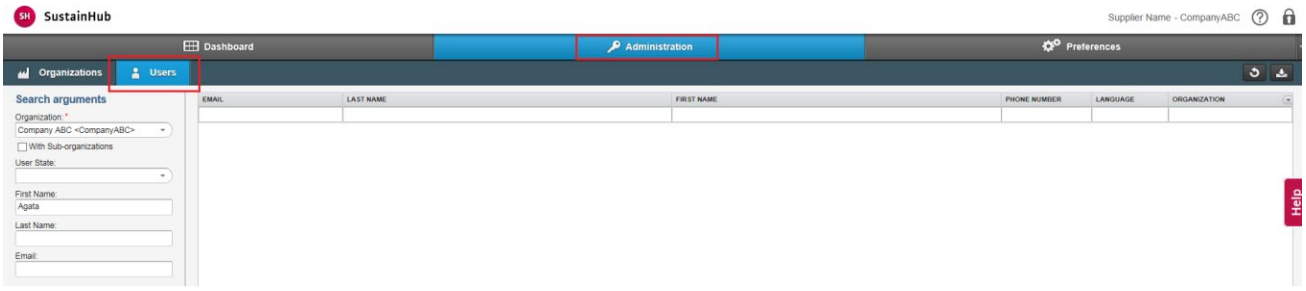
Step 3: After successful registration, a 'Register success' window will pop up, as shown on the screen below. Subsequently, you will receive an email confirming successful registration. In that email, click the 'Complete registration' link to login to the SustainHub portal.

Step 4: On the login page you will be asked to enter your email address and newly set password. Once you have it completed, click the 'Login' button.

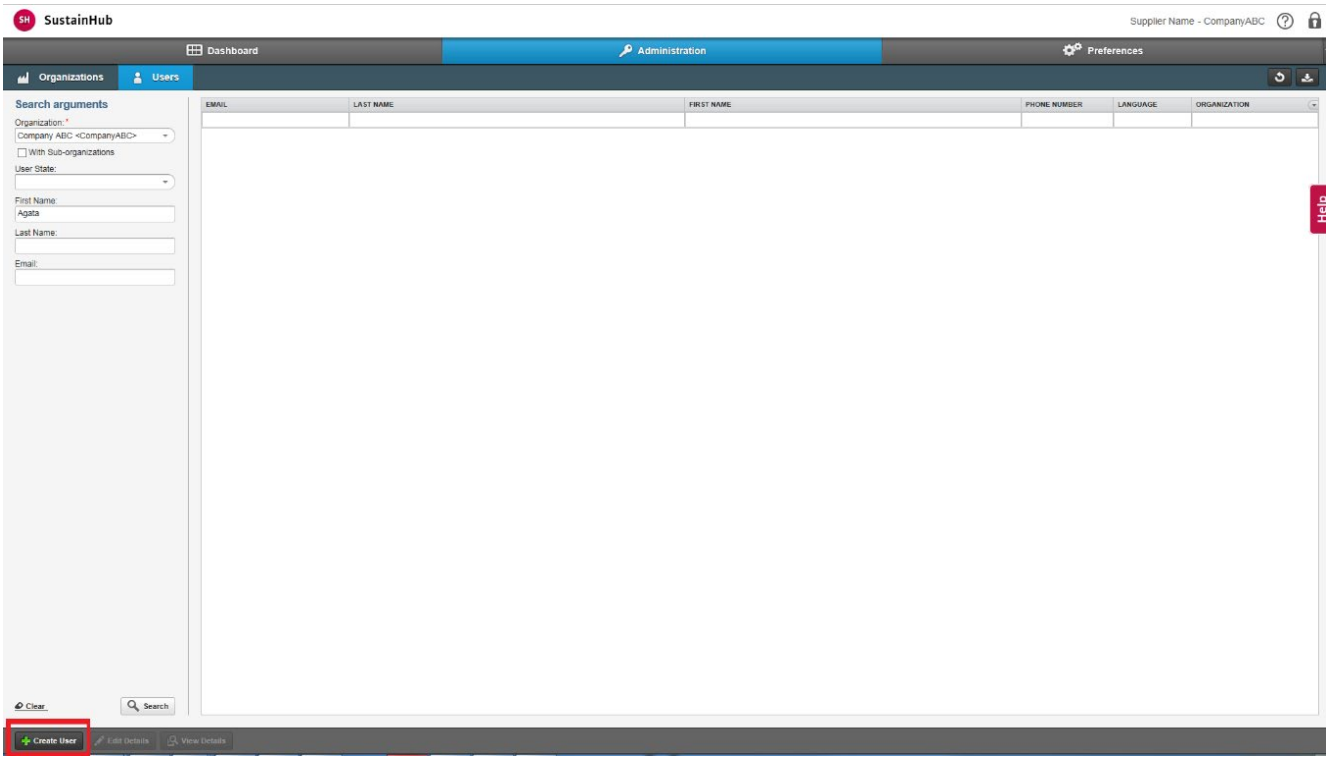


3.2 Adding a responder

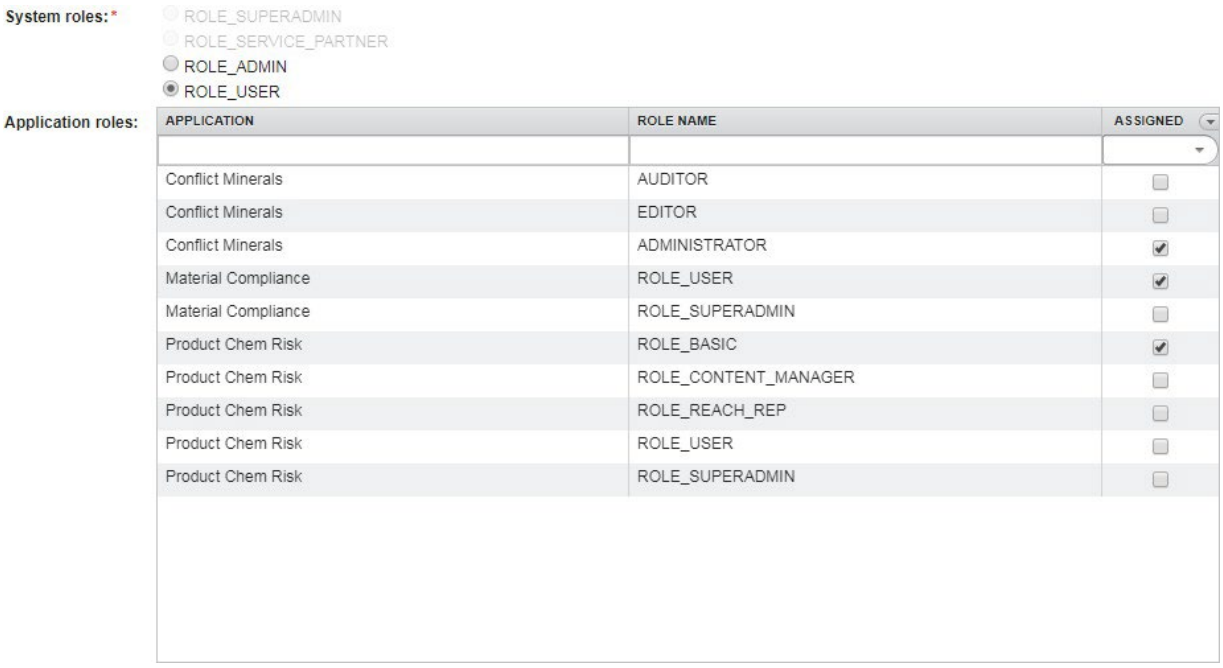
Step 1: If you are the first person registered within your company, you will automatically receive an administrator role. You can assign the request to another person from your company by going to the 'Administration' bookmark and clicking the 'User' tab.



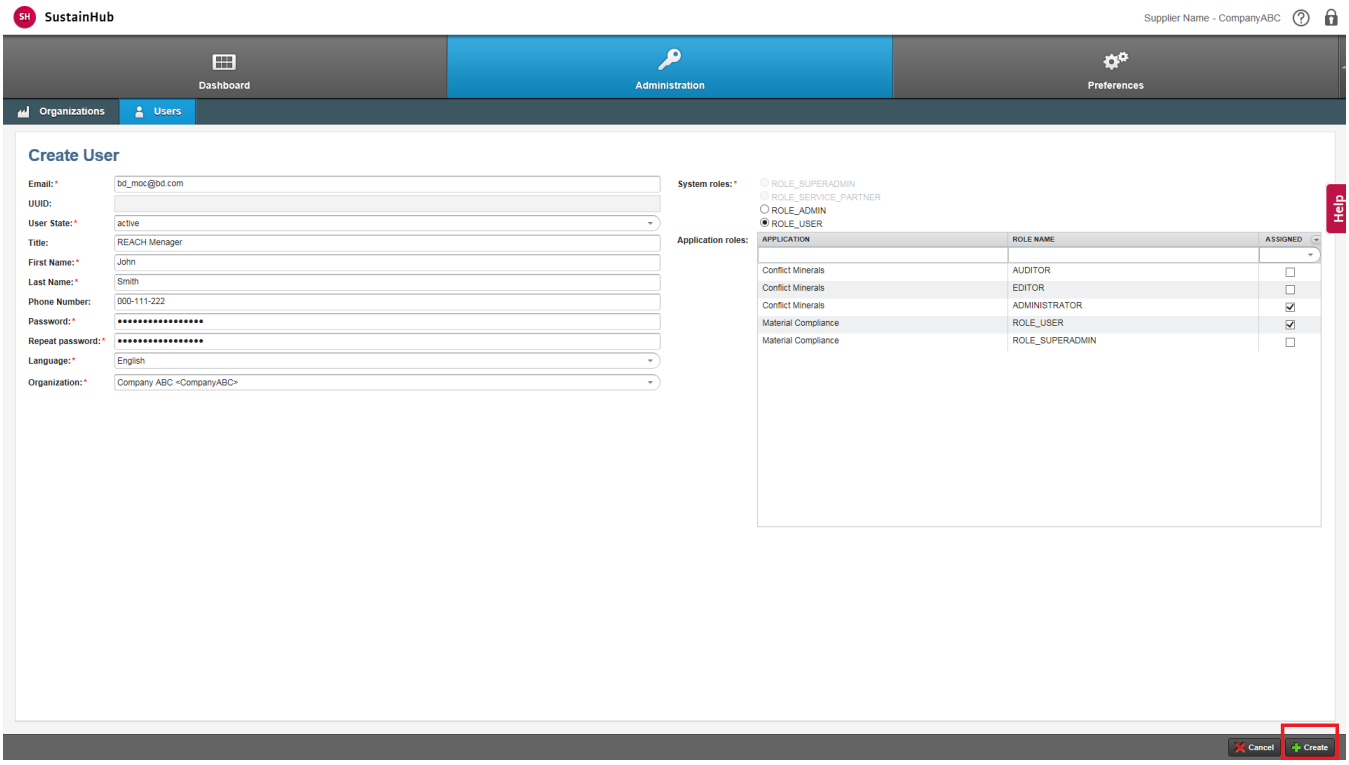
Step 2: Click the 'Create User' button at the bottom of the page.



Step 3: You will be asked to provide your coworker's email address, first and last name, set a password for him and choose the organization (only if you are an administrator for more than one organization). You should also assign system roles, for our request 'ROLE_USER' will be sufficient. Once completed, click the 'Create' button.



NOTE: All fields with a red asterisk are required.



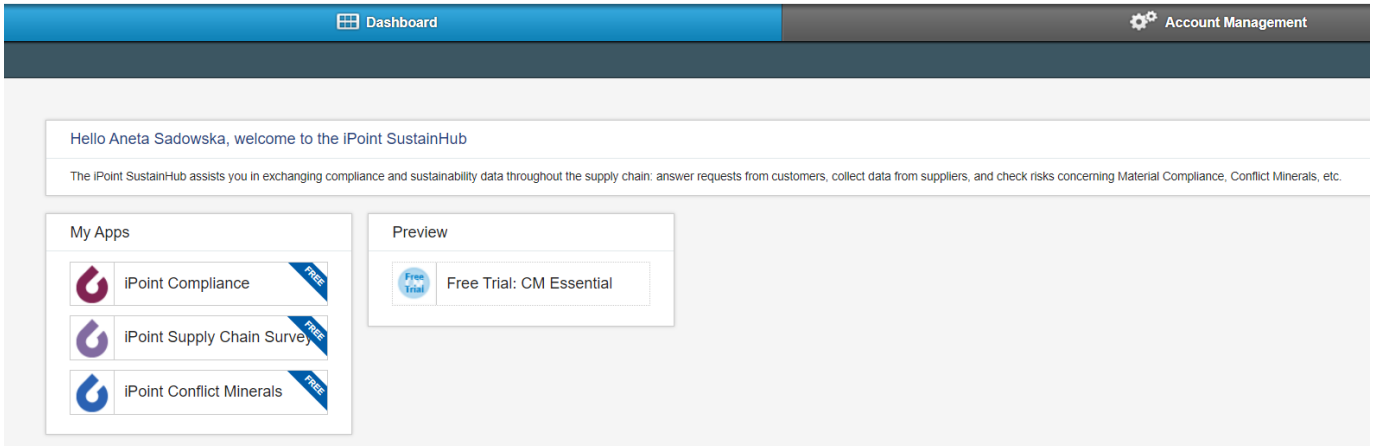
Step 4: Click the 'Create' button.

NOTE: Every time the system will have to process something in the background, you will see a loading.

sign in the top right corner: or .

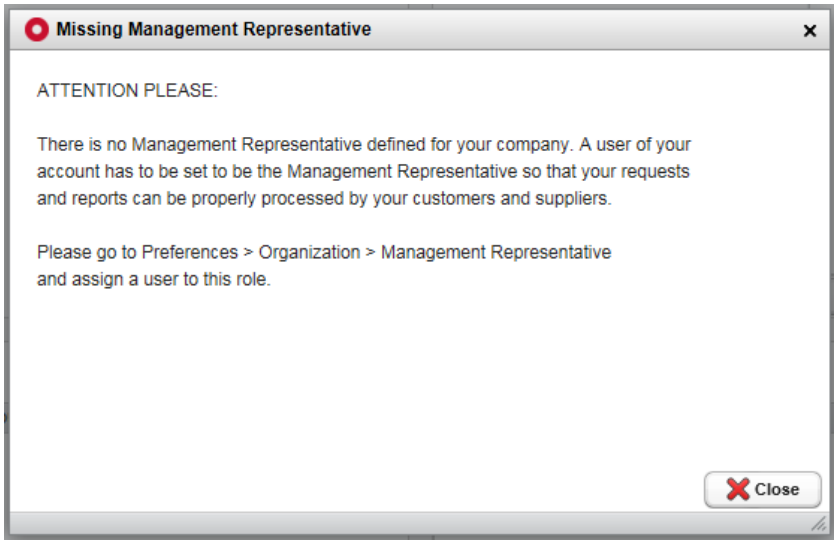
3.3 Setting up the Conflict Minerals account in the iPCMP

Step 1: Within the 'Dashboard' bookmark click the 'iPoint Conflict Minerals' button, as shown on the screen below. (If you click the iPoint Compliance' button you will enter the Materials of Concern (MOC) portal. MOC instruction can be found at http://www.bd.com/en-us/company/sustainability-at- bd/corporate-policies-and-resources-for-suppliers -> view Supplier resources.)

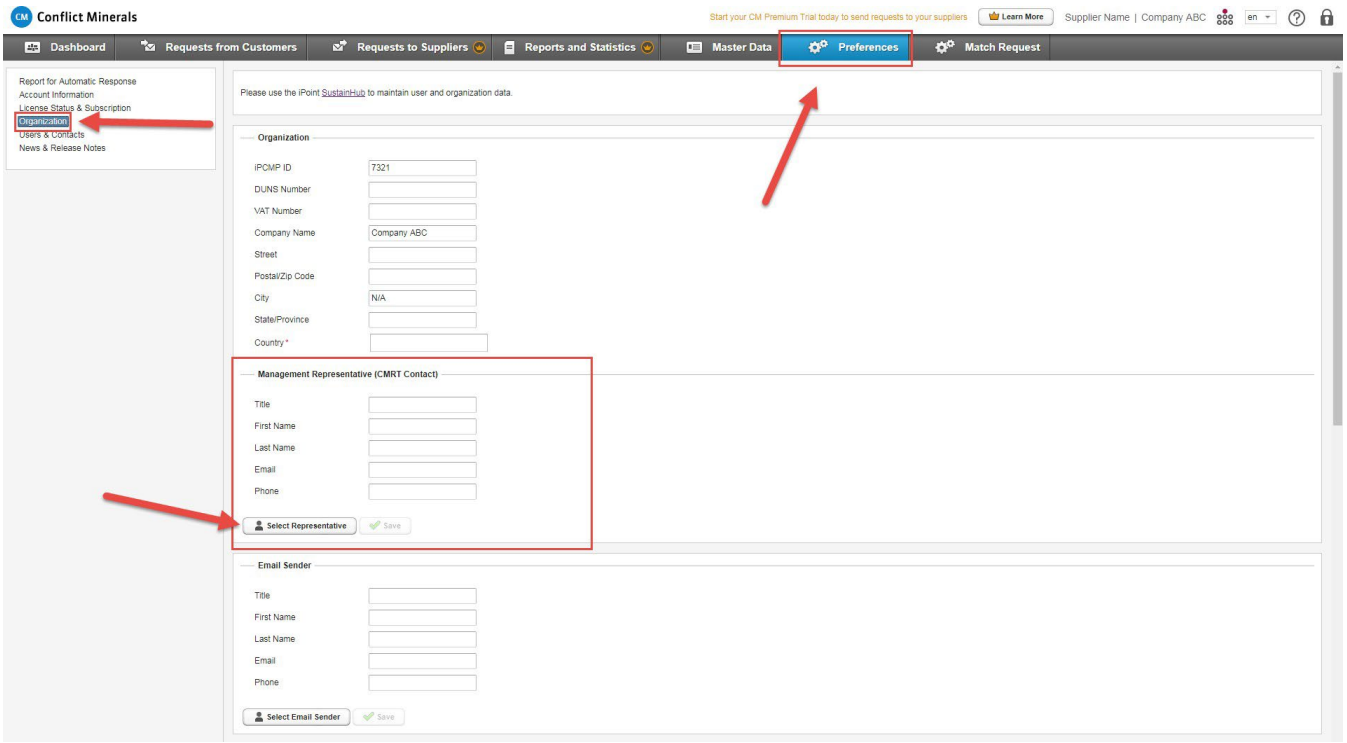


Step 2. Now, you are being redirected to the iPoint Conflict Minerals Platform. If this is your first login, you will have to read and accept the Terms of Use of the iPCMP.

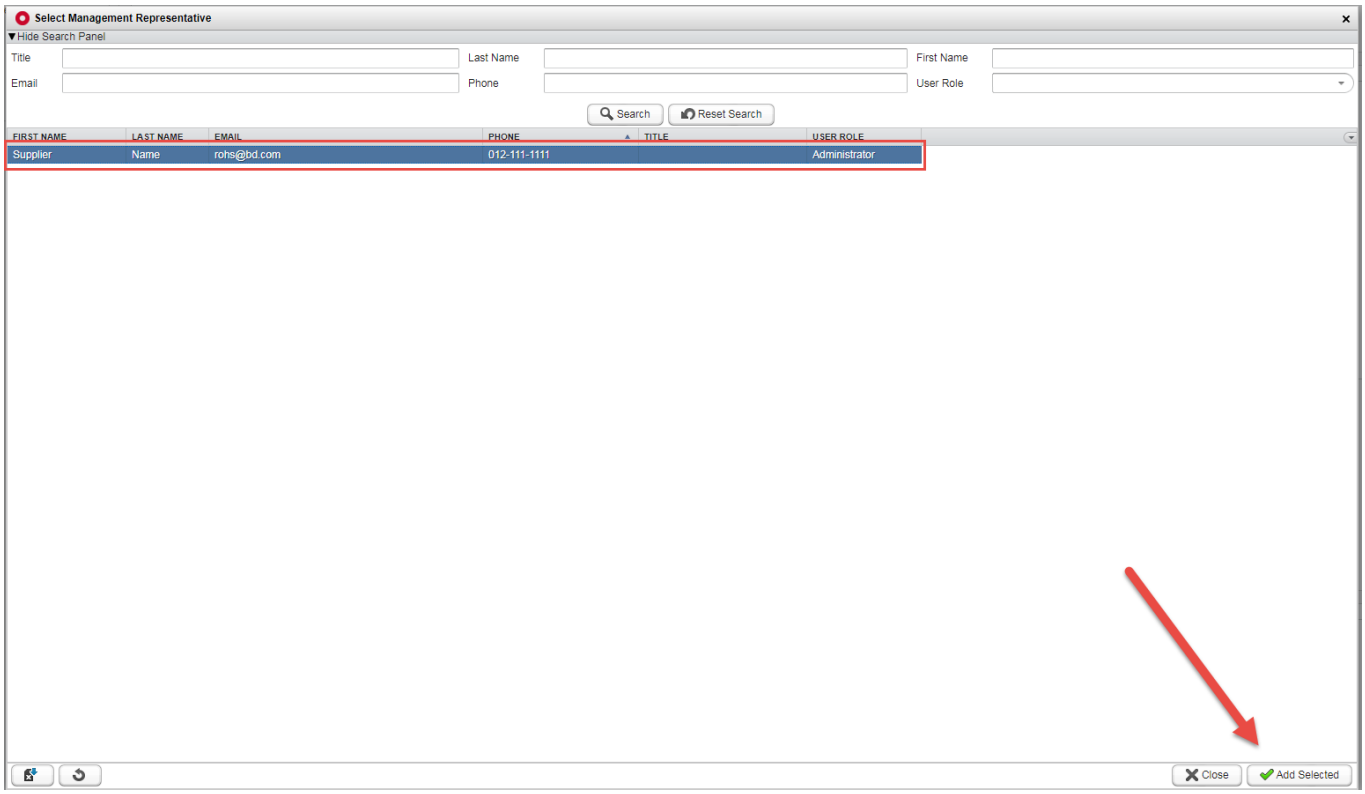
Step 3. Choose the appropriate time zone and your company size and industry.



Go to 'Preferences' tab, then 'Organization' and click on the 'Select Representative' button in the second box:



Please choose the Management Representative from the list of users assigned to your company:



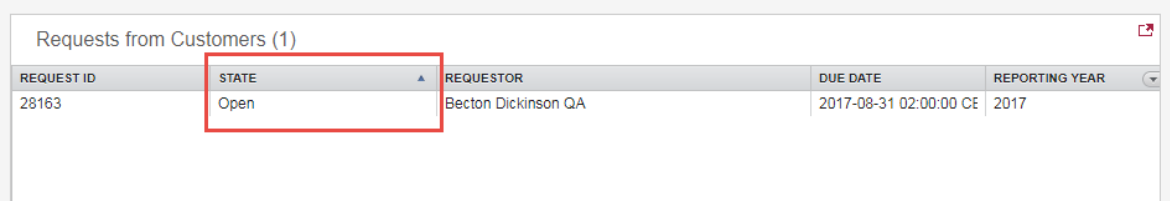
Please remember to click 'Save' button.

NOTE: This action is required in order to upload CMRT into the portal.

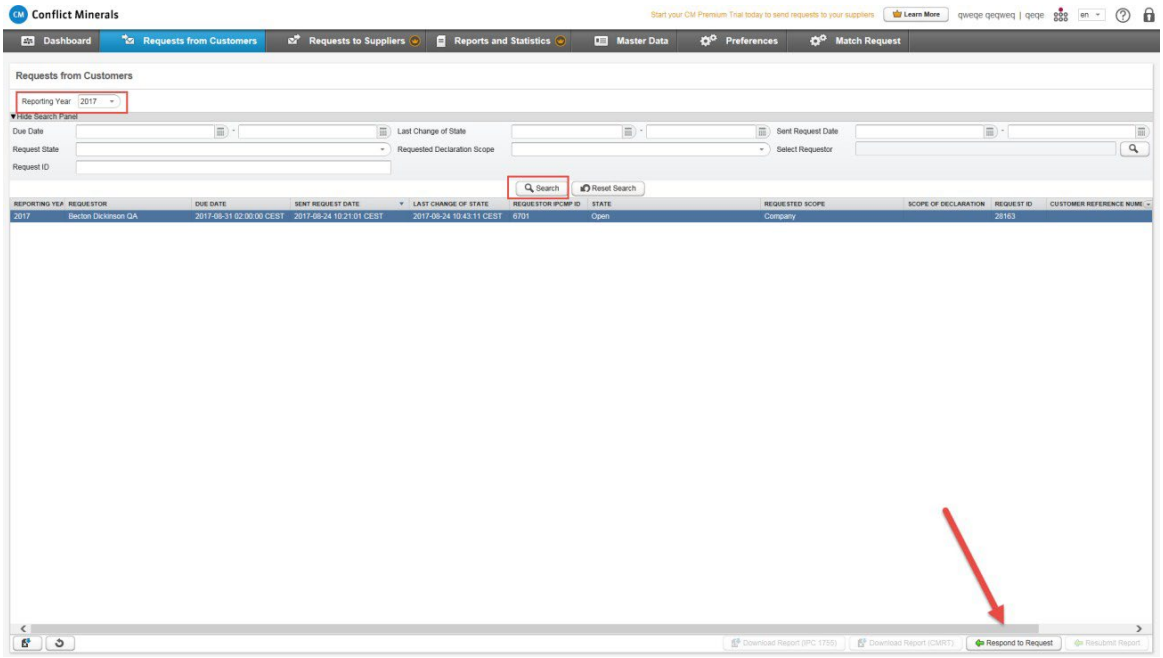
3.4 Answering Conflict Minerals request

Step 1. From the 'Dashboard' view you will be able to see all the pending requests from your customers. Please go to 'Request from Customers' tab, select the 2023 year and click 'Search'.

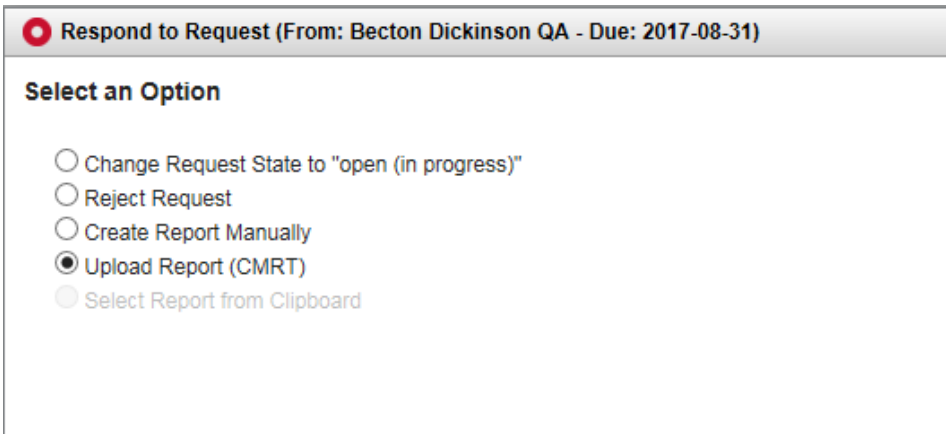
Here you will see all requests that have been sent to you by customers who use iPoint. All the pending ones will have a state 'Open':



Please choose the request you want to answer and click 'Respond to Request' button:



Step 2. Select the appropriate option:



Change Request State to 'open (in progress)'—by selecting this action, you will let us know that you received our CM inquiry but need some additional time to complete the questionnaire.

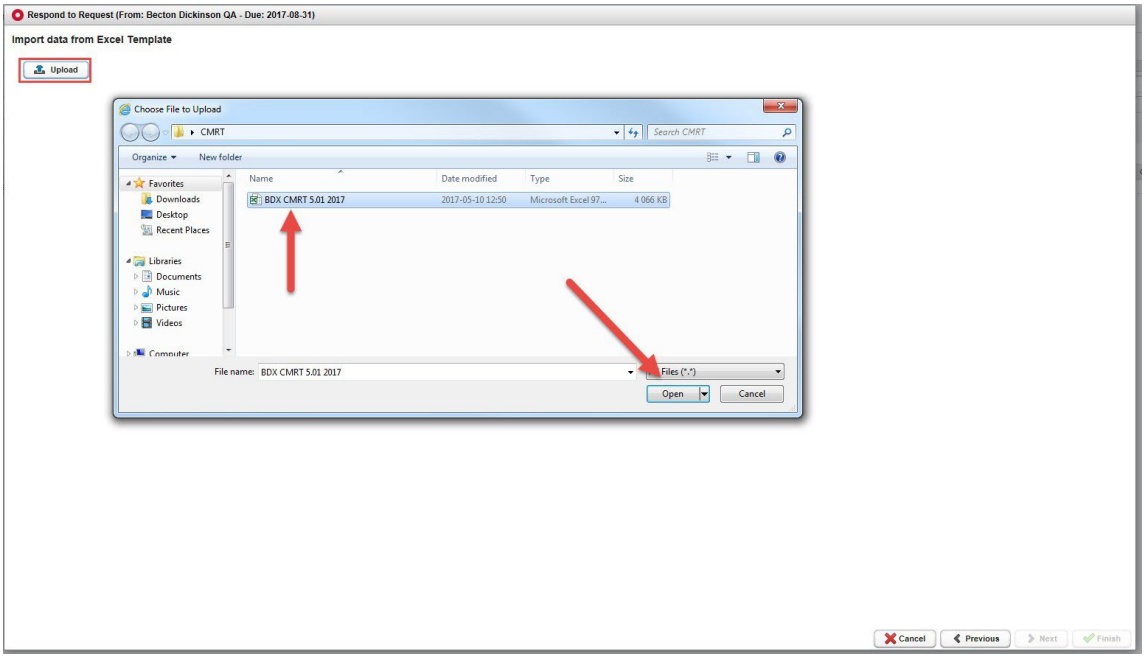
Reject Request—you are able to reject our Request if it was sent to you by mistake. In the next window you will be asked to provide a Remark. Please provide the reason for Request Rejection so we can update system accordingly.

Create Report Manually—Select this option if you do not have CMRT 6.31 ready to upload. You will complete Conflict Minerals Questionnaire in our system.

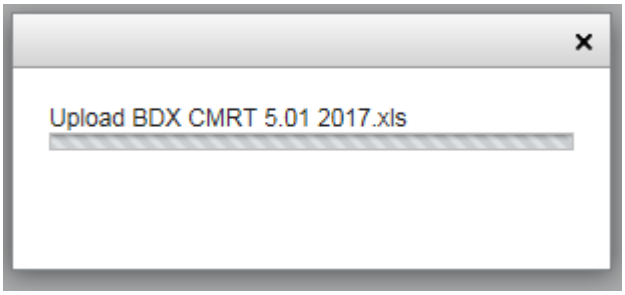
Upload Report (CMRT)—Select this option for quick upload of your CMRT.

3.4.1 Uploading the CMRT

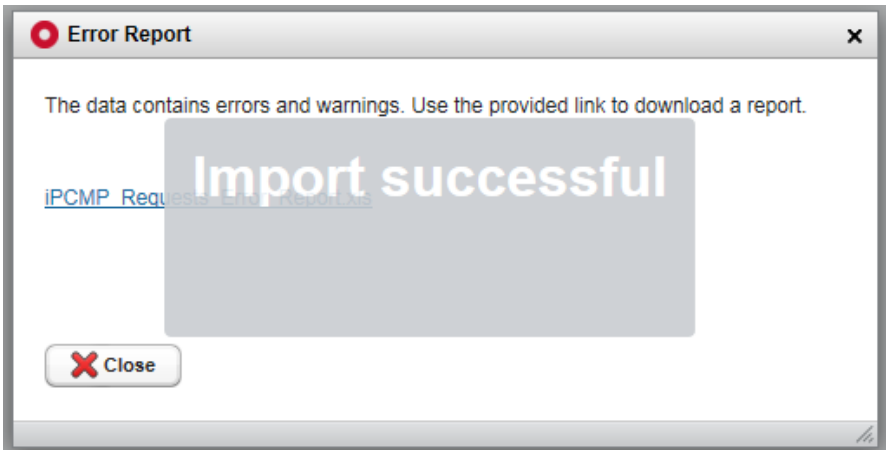
Step 1. After choosing the '*Upload Report (CMRT)'* option, you will be asked to select the CMRT file:



Please wait a few seconds while your CMRT is being uploaded:



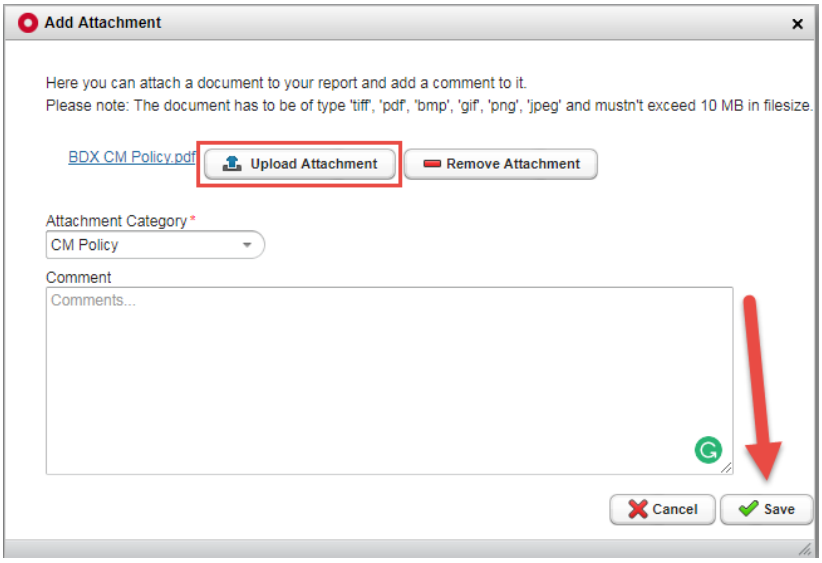
After upload you will see a short notification:



If your CMRT has some errors in it, an Error Report will be generated and you can download it to see errors in different tabs of the Excel spreadsheet. Please note that this error report DOES NOT mean that you are not allowed to proceed with uploading the CMRT file.

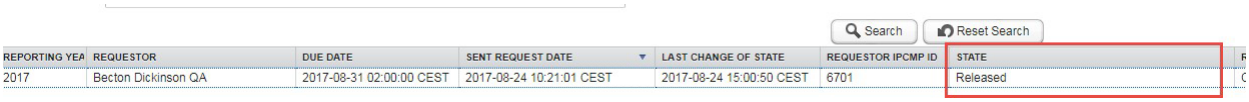
Step 2. After successfully uploading your CMRT, you will be asked to go through your declaration in iPCMP. Now, you can make any changes in your declaration if you need to. Please click the 'Next' button to proceed.

Step 3. If you have any attachments that you would like to upload, please use the Attachments window to do so:



Step 4. Now you can click the 'Finish' button. You will see a quick notification indicating that your CMRT was successfully submitted and we will receive it in our system:

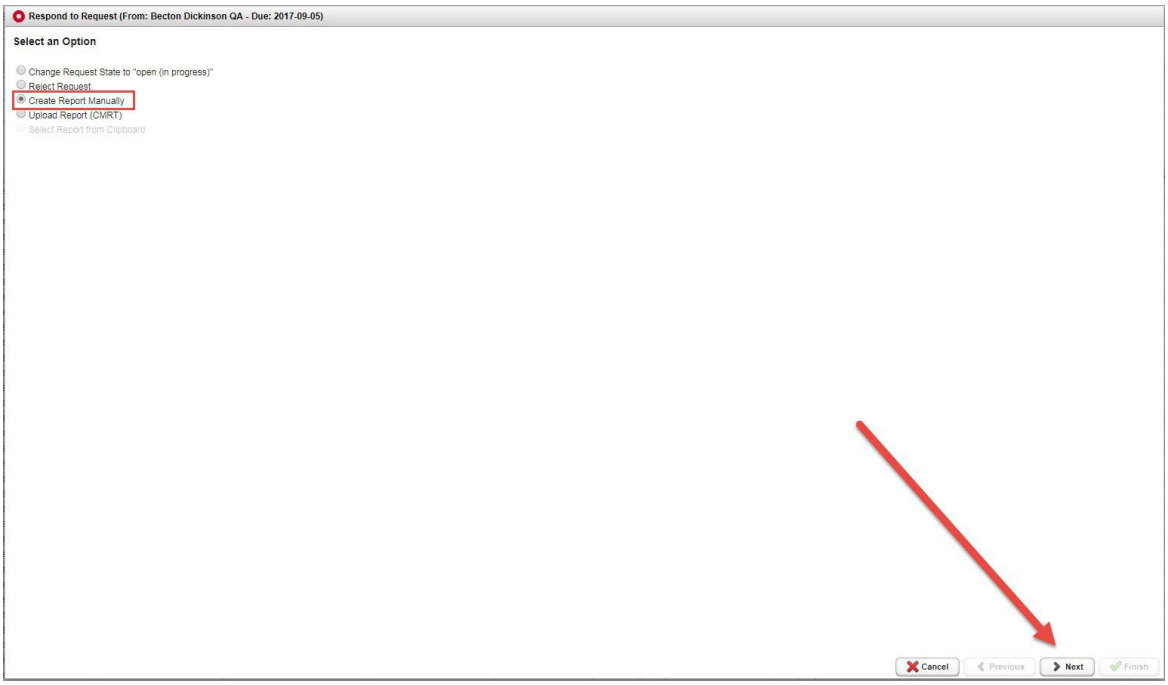
Also, the 'State' of the request will be changed to 'Released':



Step. 5 If you declared using any of the tin, tungsten, tantalum or gold, you will receive a 'Smelter Feedback' file with the additional information to assist you in your smelter outreach.

3.4.2 Answering the questionnaire manually

Step 1. If you do not have a CMRT declaration ready for upload, you can answer the same questionnaire using our system. After choosing the request you would like to answer, please click on 'Respond to Request' button, and then select 'Create Report Manually' and proceed by clicking 'Next' button:

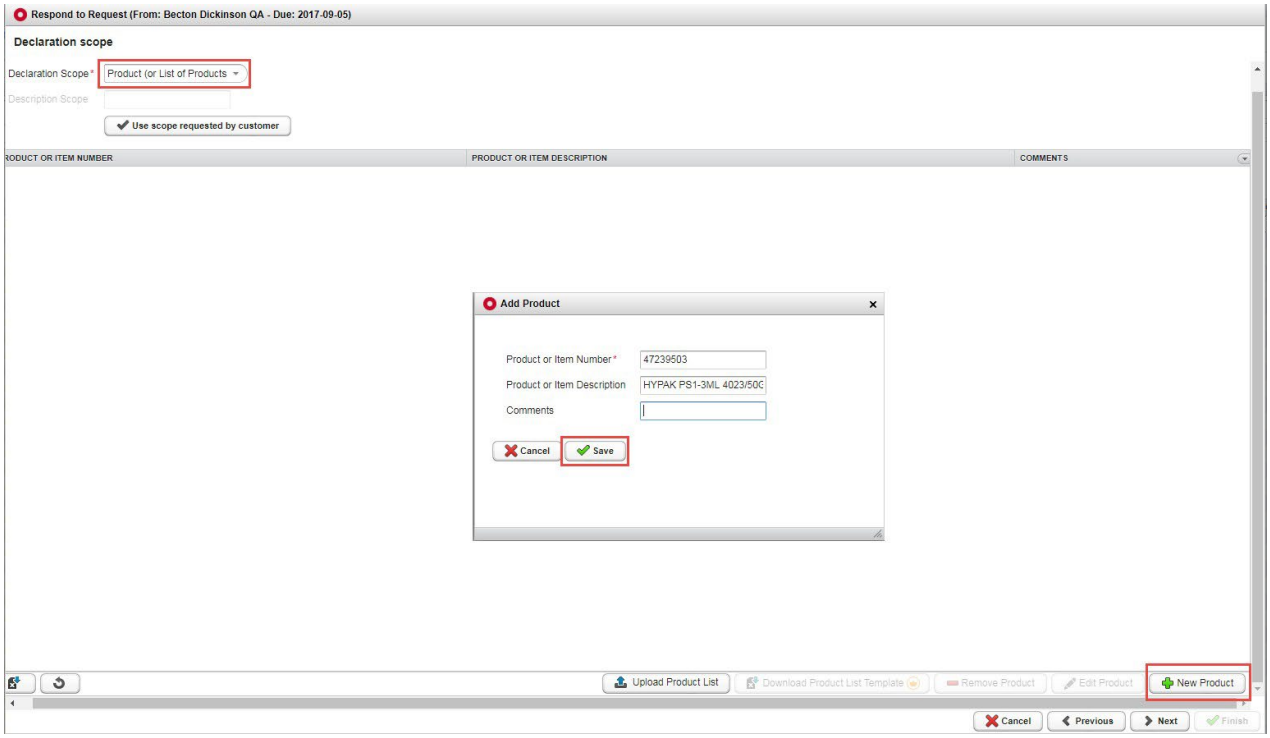


Step 2. In the next window, you will see 'Declaration scope requested by customer'. 'Scope' describes applicability of the information provided by the reporting company. BD is collecting data by Company scope on default, however, you can choose scope that is more suitable for you in the next window:

Company level - After choosing this scope, all the provided information will refer to entirety of a company's services and/or products.

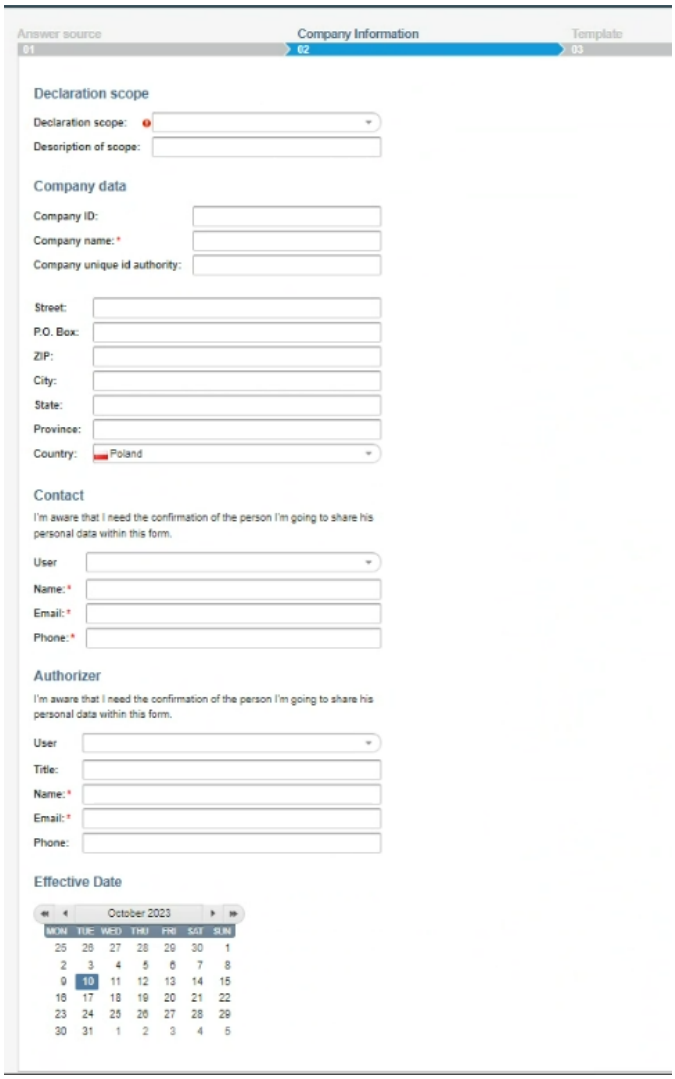
User defined - This might be a specific line of products that you would like to declare. After choosing this option, you will be asked to provide a description of the scope.

Product (or List of Products) - You can choose a specific product for which you would like to report 3TG content. After choosing this scope, you will be asked to add items that you would like to include in your declaration:



NOTE: Please note that after choosing the 'product' scope, you will have to declare all items that BD bought from your company in calendar year 2023. After uploading your response to the system, we will revise the list of products and may get back to you for some additional information.

Step 3. Click 'Next' button and fill in the organization details:



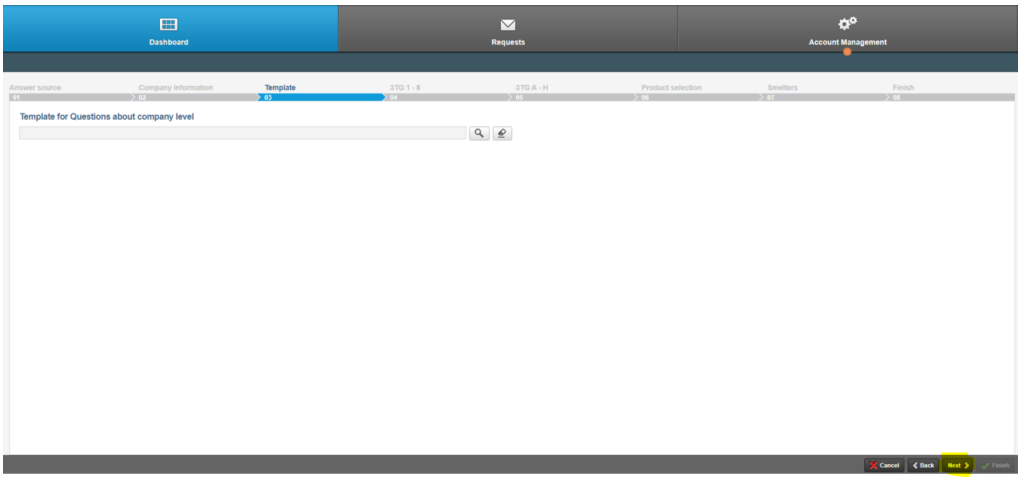
NOTE: All fields with a red asterisk are required.

'Contact' and 'Authorizer' details—Those might be the same, it depends on your company structure. 'Authorizer' can be i.e., Conflict Minerals Project manager and 'Contact' just a person uploading the data.

'Effective date'—This one should cover recent calendar year, it will be automatically set up for the present date of uploading the declaration.

Click 'Next' to proceed to next step of the declaration.

Step 4. Please click next and then answer the following questions:



Respond to Request (From: Becton Dickinson QA - Due: 2017-09-05)

Answer the following questions

1) Is any 3TG intentionally added or used in the product(s) or in the production process?

Tantalum	No	Comments...
Tin	No	Comments...
Gold	No	Comments...
Tungsten	No	Comments...

2) Does any 3TG remain in the product(s)?

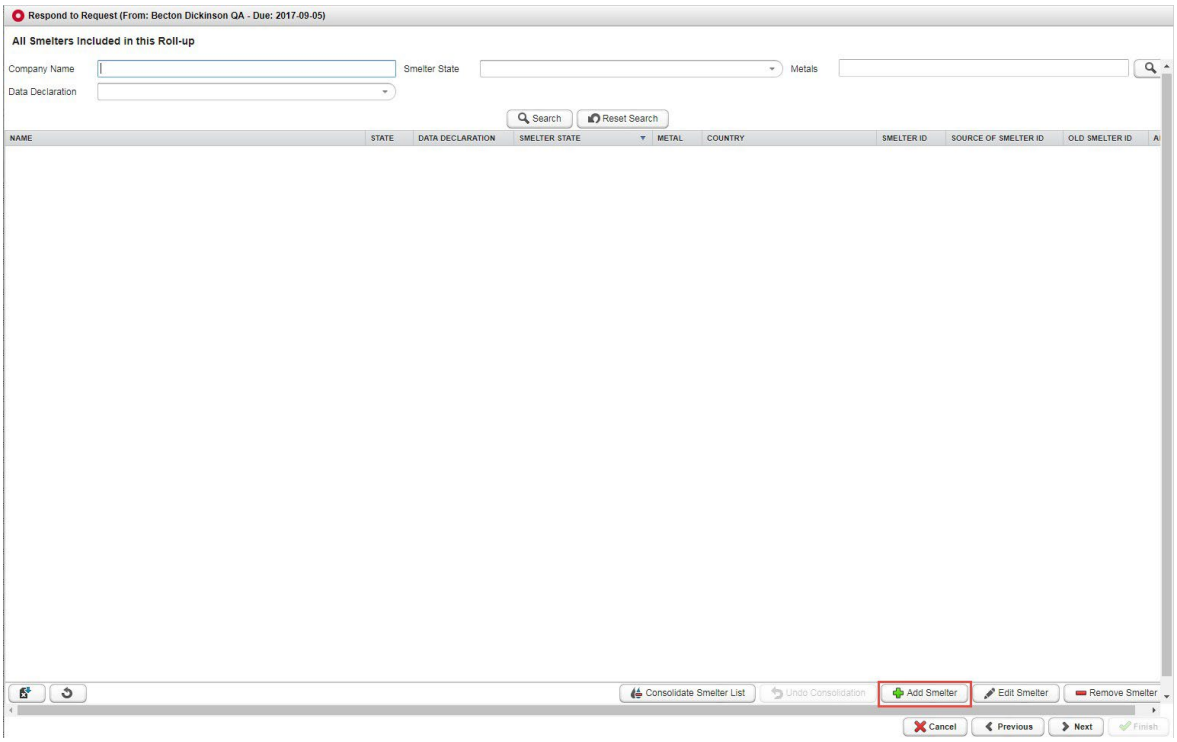
Tantalum		Comments...
Tin		Comments...
Gold		Comments...
Tungsten		Comments...

If your answer to question 1 was 'No', you can skip questions 2 to 6. They are no longer applicable. If you answer to question 1 and 2 was 'yes' you will need to complete questions 3 to 7.

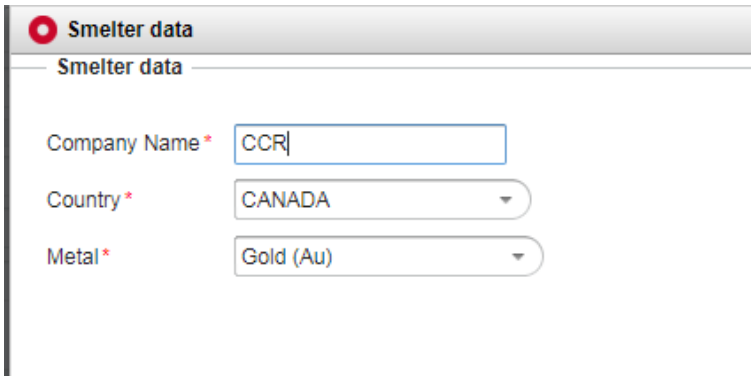
Questions A. through I. are mandatory if both responses to Question 1 and 2 are 'yes' for any metal.

Please refer to **Chapter 4** in this guidance to obtain additional information on how to understand all the questions in this declaration.

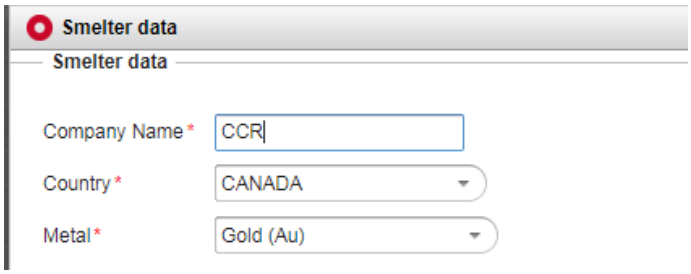
If you declared having 3TG in your products, you will be asked to include used smelters in your declaration:



Please provide smelter details, system will recognize smelter you would like to include:

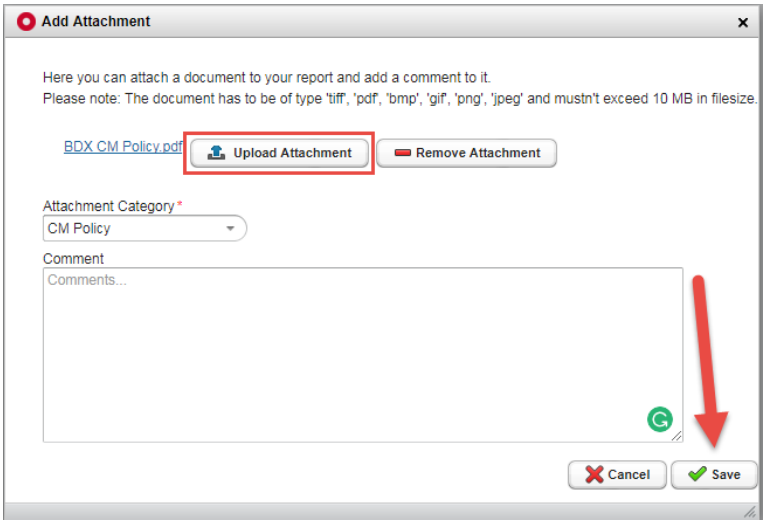


And click the 'Save' button. IPCMP system will recognize your smelter and provide all needed details:



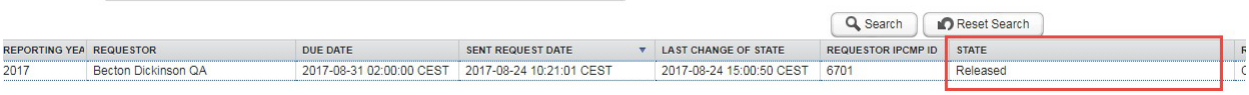
Please click the 'Apply' button if you applied all relevant smelters, please click the 'Next' button to go to Attachments section.

To upload attachments please use the Attachments window:



Step 4. Now you can click the 'Finish' button. You will see a quick notification indicating that your CMRT was successfully submitted and we will receive it in our system:

Also, the state of the request will be changed to 'Released':



Step. 5 If you declared using any of the tin, tungsten, tantalum or gold, you will receive a 'Smelter Feedback' file with the additional information to assist you in your smelter outreach.

4. Instructions for completing the Conflict Minerals Declaration Questions

The following explanation of all the Conflict Minerals Questions from iPCMP system comes from the RMI CMRT 'Instruction' tab.

4.1 Question 1

1) Is any 3TG intentionally added or used in the product(s) or in the production process? (*)	Answer	Comments
Tantalum (*)		
Tin (*)		
Gold (*)		
Tungsten (*)		

1. This is the first of two questions for which the response is used to determine whether the 3TG is within the scope of conflict minerals reporting requirements. This question relies on the guidance provided by the SEC in the final rules regarding the determination if a 3TG is 'necessary to the functionality or production' of a product. The SEC guidance is based upon the presumption that a company in the supply chain for a product would not intentionally add a 3TG to that product or any of a product's sub-components if that 3TG was not necessary to the product's generally expected function, use or purpose. Similarly, the guidance presumes that a 3TG would not be necessary to the production of a product unless it was intentionally included in the production process of that product. The response to this question serves to exclude any trace-level contaminants or naturally-occurring by-products such as tin in steel. This question shall be answered for each 3TG.

This question asks if any conflict minerals are used as raw material, component or additive in a product that you manufacture or contract to manufacture (including raw material and components). Impurities from raw materials, components, additives, abrasives and cutting tools are outside the scope of the survey.

This question shall be answered for each 3TG. Valid responses to this question are either 'yes' or 'no'. This question is mandatory.

4.2 Question 2

2) Does any 3TG remain in the product(s)? (*)	Answer	Comments
Tantalum (*)		
Tin (*)		
Gold (*)		
Tungsten (*)		

2. This question shall be answered for each 3TG for each the answer to question 1 is 'yes.' This is the second of two questions for which the response is used to determine whether the 3TG is within the scope of conflict minerals reporting requirements as described in the SECs final rules regarding the determination if a 3TG is necessary to the functionality or production of a product. This question is dependent on the response to question 1. This question is intended to identify 3TGs that are intentionally added or included in the manufacturing process of a product where some amount of the 3TG remains in the finished product. This includes 3TGs which may not have been intended to become part of the final product and may not be necessary to the functionality of the product but are only present as residuals of the manufacturing process. In many cases, the manufacturer may have attempted to remove or facilitate consumption of the 3TG during the manufacturing process, however, some amount of the 3TG remains. Should the 3TG, which is added or included during the manufacturing process, be completely removed such that none of the 3TG remains upon the completion of that process, the response to this question would be no.

This question shall be answered for each 3TG. Valid answers to this question are either 'yes' or 'no'. This question is mandatory.

4.3 Question 3

3) Do any of the smelters in your supply chain source the 3TG from the covered countries? (SEC term, see definitions tab) (*)	Answer	Comments
Tantalum (*)		
Tin (*)		
Gold (*)		
Tungsten (*)		

3. This is a declaration that any portion of the 3TGs contained in a product or multiple products originates from the DRC or an adjoining country (covered countries). The answer to this question should be 'yes' if any smelter in the supply chain sources from the covered countries, even if those smelters are on the RMI compliant smelter and refiner list. For more information, see RMI's due diligence guidance on conflict minerals here:

http://www.responsiblemineralsinitiative.org/training-and- resources/publications-and-guidance/.

The answer to this question shall be 'yes', 'no', or 'unknown'. Substantiate a 'yes' answer in the comments section. This question is mandatory for a specific metal if the response to question 1 and 2 is 'yes' for that metal.

4.4 Question 4

4) Do any of the smelters in your supply chain source the 3TG from conflict-affected and high-risk areas? (*)	Answer	Comments
Tantalum (*)		
Tin (*)		
Gold (*)		
Tungsten (*)		

4. This is a declaration that any portion of the 3TGs contained in a product or multiple products originates from conflict-affected and high-risk areas (CAHRAs).

The answer to this question should be 'yes' if any smelter in the supply chain sources from covered countries or CAHRAs, even if those smelters are on the RMI conformant smelter and refiner list. For more information, see RMI's due diligence guidance on conflict minerals here:

http://www.responsiblemineralsinitiative.org/training-and-resources/publications-and-guidance/.

The answer to this question shall be 'yes,' 'no' or 'unknown'. It is recommended to substantiate a 'yes' answer in the comments section. This question is mandatory for a specific metal if the response to Question 1 and 2 is 'yes' for that metal.

4.5 Question 5

5) Does 100 percent of the 3TG (necessary to the functionality or production of your products) originate from recycled or scrap sources? (*)	Answer	Comments
Tantalum (*)		
Tin (*)		
Gold (*)		
Tungsten (*)		

5. This is a declaration that identifies whether 3TGs contained in the product(s necessary to the functionality of that product(s) originate from recycled or scrap sources.

The answer to this question shall be 'yes', 'no', or 'unknown'. This question is mandatory for a specific metal if the response to Question 1 and 2 is 'Yes' for that metal.

A 'Yes' answer means that 100% of the 3TG comes from recycled or scrap sources. A 'No' answer means that some of the 3TG does not come from recycled or scrap sources. An 'Unknown' answer means that the user does not know whether or not 100% of the 3TG comes from recycled or scrap sources.

4.6 Question 6

6) What percentage of relevant suppliers have provided a response to your supply chain survey? (*)	Answer	Comments
Tantalum (*)		
Tin (*)		
Gold (*)		
Tungsten (*)		

6. This is a question to determine whether a company has received conflict minerals disclosures from all direct suppliers reasonably believed to be providing 3TGs contained in the products covered by the scope of this declaration. Permissible responses to this question are:

- 100%
- Greater than 90%
- Greater than 75%
- Greater than 50%
- 50% or less
- None

This question is mandatory for a specific metal if the response to Question 1 and 2 is 'Yes' for that metal.

4.7 Question 7

7) Have you identified all of the smelters supplying the 3TG to your supply chain? (*)	Answer	Comments
Tantalum (*)		
Tin (*)		
Gold (*)		
Tungsten (*)		

7. This question verifies if the supplier has reason to believe they have identified all of the smelters providing 3TGs in the products covered by this declaration. The answer to this question shall be 'Yes' or 'No', along with a comment in certain cases, e.g. list of smelters.

This question is mandatory for a specific metal if the response to Question 1 and 2 is 'Yes' for that metal.

4.8 Question 8

8) Has all applicable smelter information received by your company been reported in this declaration? (*)	Answer	Comments
Tantalum (*)		
Tin (*)		
Gold (*)		
Tungsten (*)		

8. This question verifies that all of the smelters identified to be providing any of the 3TGs contained in the products covered by the scope of this declaration have been reported in this declaration. The answer to this question shall be "yes" or "no" along with a comment in certain cases, e.g. list of smelters. This question is mandatory for a specific metal if the response to Question 1 and 2 is "Yes" for that metal.

4.9 Questions A - H

Instructions for completing questions A - H (rows 75–89). Questions A through H are mandatory if the both of responses to question 1 and 2 are 'yes' for any metal.

Provide answers in ENGLISH only.

The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-affected and High-risk Areas (OECD Guidance) defines 'Due Diligence' as 'an on-going, proactive and reactive process through which companies can ensure that they respect human rights and do not contribute to conflict'. Due diligence should be an integral part of your company's overall conflict free sourcing strategy. Questions A through H are designed to assess your company's conflict-free minerals sourcing due diligence activities. Responses to these questions shall represent the full scope of your company's activities and shall not be limited to the 'Declaration Scope' selected in the company information section.

A. This is a declaration to disclose whether a company has a conflict minerals sourcing policy. The answer to this question shall be 'yes' or 'no.' Comments shall be captured in a question comment field.

This question is mandatory.

B. This is a declaration to disclose whether a company's conflict minerals sourcing policy is available on the company website. The answer to this question shall be 'yes' or 'no.' If 'yes' the user shall specify the URL in a question comment field.

This question is mandatory.

C. This is a question to determine whether a company requires their direct suppliers to source 3TG from validated smelters. The answer to this question shall be 'yes' or 'no.' Comments shall be captured in a question comment field.

This question is mandatory.

D. Please answer 'yes' or 'no' to disclose whether your company has implemented conflict minerals sourcing due diligence measures. This declaration is not intended to provide the details of a company's due diligence measures—just that a company has implemented due diligence measures. The aspects of acceptable due diligence measures shall be determined by the requestor and supplier.

Examples of due diligence measures may include: communicating and incorporating into contracts (where possible) your expectations to suppliers on conflict-free mineral supply chain; identifying and

assessing risks in the supply chain; designing and implementing a strategy to respond to identified risks; verifying your direct supplier's compliance to its DRC conflict-free policy, etc. These due diligence measure examples are consistent with the guidelines included in the internationally recognized OECD Guidance.

E. This is a question to disclose whether a company requests their supplier to fill out a conflict minerals declaration. Acceptable answers are listed below, in certain cases further explanation may be required, i.e., to provide the format used for collecting information. If the answer is 'yes,' using other format the user shall provide a comment in a question comment field. Permissible responses to this question are:

- Yes, in conformance with IPC-1755 [e.g., CMRT]

- Yes, using other format (describe).

-No

This question is mandatory.

F. Please answer 'yes' or 'no'. In the comments section, you can provide additional information on your approach. Examples could be:

Third party audit—on-site audits of your suppliers conducted by independent third parties.

Documentation review only—a review of supplier submitted records and documentation conducted by independent third parties and/or your company personnel.

Internal audit—on-site audits of your suppliers conducted by your company personnel. This

question is mandatory.

G. This is a question to disclose whether a company's review process includes corrective action management. The answer to this question shall be 'yes' or 'no.' Comments shall be captured in a question comment field.

This question is mandatory.

H. This is a question to disclose whether a company is subject to the SEC rule, the EU regulation, or both. he answer to this question shall be 'yes, with the SEC', 'yes, with the EU', 'yes with the SEC and the EU' or 'no'. Comments shall be captured in a question comment field. This question is mandatory. For more information on the SEC rule, please refer to www.sec.gov. For more information on the EU regulation, please refer to https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017R0821&from=EN.

2. FAQ—Frequently asked questions

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

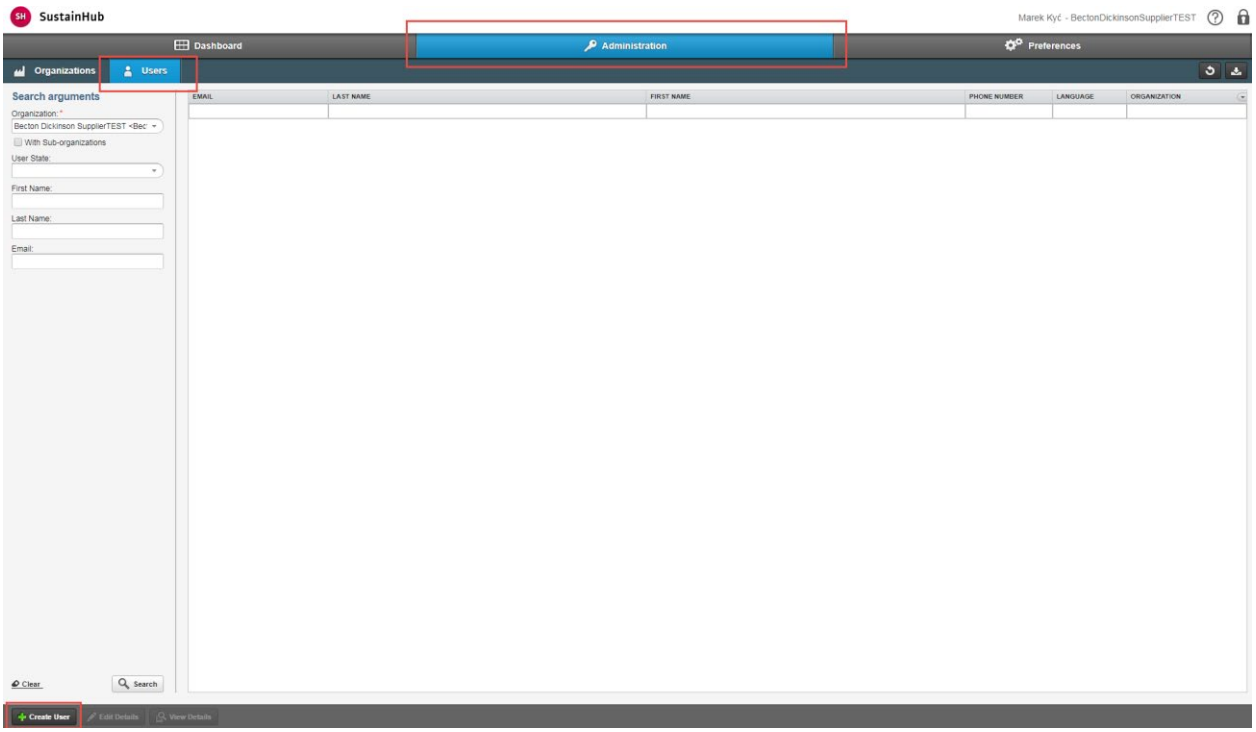
A: Lack of response within the given time will result in escalation to BD Global Procurement and if a satisfactory response is not provided, BD may be forced to seek an alternative supplier. Please contact the BD Conflict Minerals Team (ConflictMinerals@bd.com) to discuss or obtain further guidance.

Q: I am not the correct person to be contacted for Conflict Minerals 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 email/ questionnaire to this person:

1) When you receive the first email with the link to the registration site, you can forward it to appropriate person. The link has a unique key in it and the other person can finish the registration by using his email. This person will be have the administration rights now.

2) After you finished the registration, the person who has the administration rights can add a new user by creating a new account in SustainHub:



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

A: The Conflict Minerals Rule requires BD to obtain information from its supply chain, irrespective of whether a supplier is a public company or is located in the United States. BD also solicits this information as part of its commitment to ethical business practices.

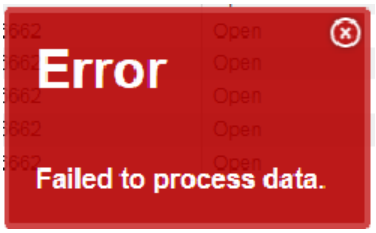
Q: I have already answered a questionnaire. Why am I being asked again?

A: The Conflict Minerals Rule requires all public companies to report information on a calendar year basis. In addition, many suppliers have periodic changes in their supply chains. Therefore, questionnaires are sent to our suppliers for updated information on an annual basis.

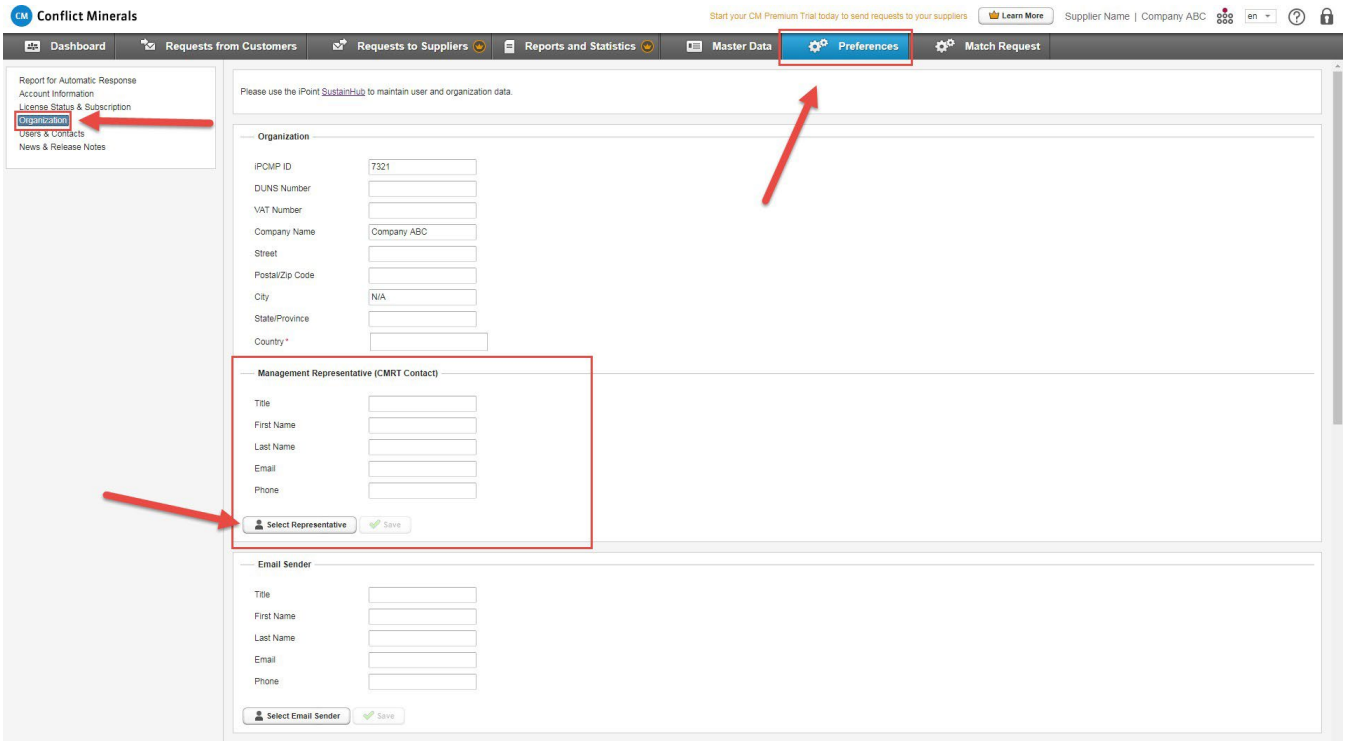
Q: What happens if I do not respond on time?

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

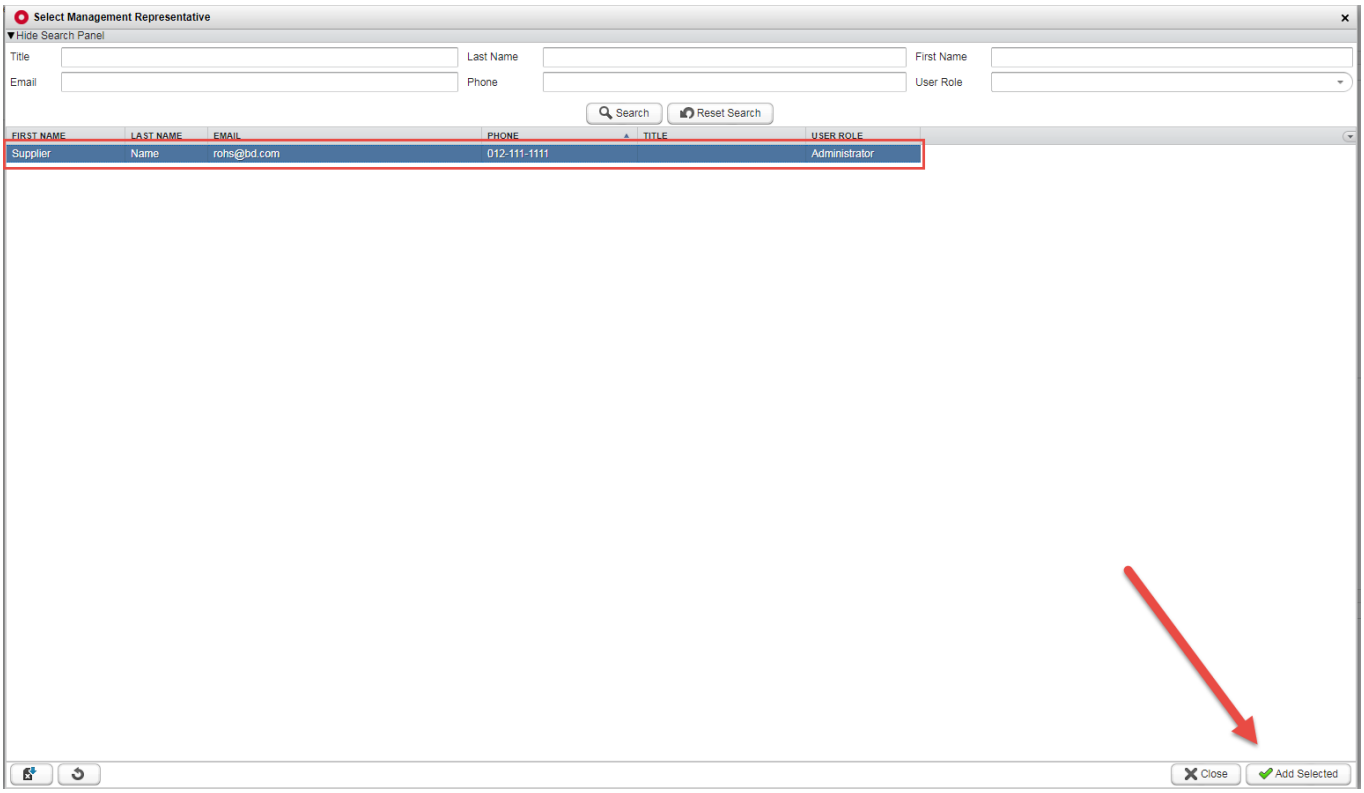
Q: When I try to upload my CMRT into the portal I receive a pop-up message as shown below:



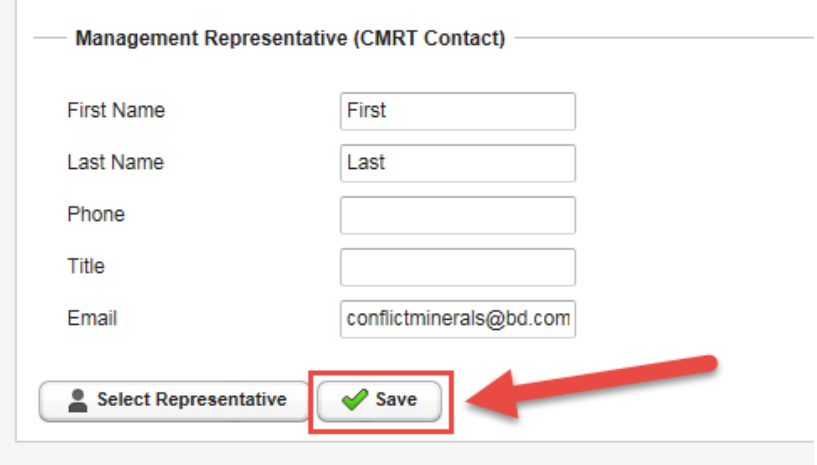
A: This means that you have not chosen the Management Representative for your company. Please go to 'Preferences' tab, then 'Organization' and click on the 'Select Representative' button in the second box:



Please choose the Management Representative from the list of users assigned to your company:



Please remember to click 'Save' button.



NOTE: This action is required in order to upload CMRT into the portal.

3. Helpful links

SEC FINAL RULE

http://www.sec.gov/rules/final/2012/34-67716.pdf

SEC FAQs

http://www.sec.gov/divisions/corpfin/guidance/conflictminerals-faq.htm

Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Third Edition

http://www.oecd.org/publications/oecd-due-diligence-guidance-for-responsible-supply-chains-of- minerals-from-conflict-affected-and-high-risk-areas-9789264252479-en.htm

Additional information regarding the Organisation for Economic Co-operation and Development (OECD) can be found at:

http://www.oecd.org/

Additional information on the RMI, including the Template, is available at: http://www.responsiblemineralsinitiative.org/

iPoint SustainHub:

https://sustainhub.ipoint-systems.com/authserver/login

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